

# PRIVACY POLICY

Effective Date: 1 January 2026

Version: 2.0

## PREAMBLE

This Privacy Policy (hereinafter the "Policy") sets forth the data protection practices of FR TEAM INTERNATIONAL S.A., a *Société Anonyme* incorporated under the laws of the Grand-Duchy of Luxembourg (hereinafter "AutoTuner," "the Company," "We," "Us," or "Our").

We are committed to protecting the privacy and security of Our Users. This Policy explains how We collect, use, disclose, and safeguard Your personal data when You access Our website [www.autotuner.com](http://www.autotuner.com), use the AT Cloud platform, or operate Our Products, including the AutoTuner Tool and AutoTuner One.

This Policy is an integral part of Our Terms of Service. By creating an Account, purchasing a Product, or using Our Services, You acknowledge that You have read and understood this Policy.

## 1. IDENTITY OF THE DATA CONTROLLER

The entity responsible for the processing of Your personal data (the Data Controller) is:

### FR TEAM INTERNATIONAL S.A.

47, An der Fraesbich

L-8509 Redange

Luxembourg

Trade and Companies Register (RCS): B160562

VAT: LU24677264

Email for Privacy Inquiries: [dpo@fr-team.lu](mailto:dpo@fr-team.lu)

## 2. DEFINITIONS

Capitalized terms used in this Policy shall have the meanings ascribed to them in the Terms of Service. For the purposes of this Policy:

- **"Personal Data"** means any information relating to an identified or identifiable natural person ("Data Subject").
- **"Processing"** means any operation performed on Personal Data, such as collection, storage, use, or erasure.
- **"VIN"** means the Vehicle Identification Number.

### 3. DATA WE COLLECT

We collect data to provide, secure, and improve Our licensed Services. The categories of data We process include:

#### 3.1. Account and Identity Data

When You register for an Account or purchase a Product, We collect:

- **Identification:** Full name, company name, VAT number.
- **Contact Details:** Email address, billing address, shipping address, phone number.
- **Credentials:** Encrypted account passwords.
- **Significance:** Your email address serves as the unique **License Key** linking Your identity to the specific hardware serial number of Your AutoTuner Tool.

#### 3.2. Automotive and Technical Data

The operation of the AutoTuner Tool requires the processing of vehicle data. Following recent European jurisprudence (CJEU Case C-319/22), We treat Vehicle Identification Numbers (VINs) associated with an Account as Personal Data.

- **Vehicle Data:** VIN, ECU hardware/software numbers, calibration IDs, diagnostic trouble codes (DTCs), and real-time sensor data (datalog).
- **Uploaded Files:** Original (stock) and modified (tuned) ECU files uploaded to the AT Cloud or processed via the Tool.

#### 3.3. Device Telemetry and Security Logs

To protect Our Intellectual Property and enforce the Master/Slave restrictions defined in the Terms of Service, Our systems automatically collect:

- **Device Info:** Tool serial number, firmware version, IP address, connection timestamps.
- **Usage Stats:** Success/failure rates of protocols, read/write operation counters.

#### 3.4. Financial Data

We process transaction history and invoice records.

**Note:** We do not store full credit card numbers. Payments are processed by third-party PCI-DSS compliant providers (e.g., Stripe, PayPal), who provide Us with a secure token to validate the transaction.

#### 4. PURPOSES AND LEGAL BASIS FOR PROCESSING

We process Your data only where We have a lawful basis to do so, in accordance with Article 6 of the GDPR:

Purpose of Processing	Legal Basis (GDPR)
<b>Service Delivery:</b> Managing Your Account, verifying software licenses, delivering updates, and providing technical support.	<b>Performance of Contract</b> (Art. 6(1)(b))
<b>Master/Slave Operations:</b> Facilitating the encrypted transfer of files between a Slave User and their designated Master.	<b>Performance of Contract</b> (Art. 6(1)(b))
<b>Billing &amp; Compliance:</b> Issuing invoices, VAT validation, and accounting.	<b>Legal Obligation</b> (Art. 6(1)(c))
<b>Security &amp; Anti-Piracy:</b> Detecting cloning attempts, unauthorized transfers, or Terms of Service violations via IP/telemetry monitoring.	<b>Legitimate Interest</b> (Art. 6(1)(f))
<b>Product Improvement:</b> Analyzing crash logs and read/write success rates to improve ECU protocols.	<b>Legitimate Interest</b> (Art. 6(1)(f))
<b>Marketing:</b> Sending newsletters regarding new protocols or features.	<b>Consent</b> (Art. 6(1)(a))

#### 5. SPECIFIC PROVISIONS FOR MASTER/SLAVE AND RESELLERS

##### 5.1. Master and Slave Architecture

If You use a **Slave Tool**, You acknowledge that the files You read from a vehicle are encrypted. These files are transmitted to Your designated **Master User** to allow them to provide You with tuning services.

- **Data Sharing:** By using a Slave Tool, You explicitly authorize Us to transfer Your read files and Your identity (Name/Email) to Your designated Master. This transfer is necessary for the functionality of the Slave Tool.

##### 5.2. AutoTuner One (B2B2C)

If You are a **Reseller** selling the AutoTuner One to End-Customers:

- **Your Role:** You act as the Data Controller for Your End-Customer's personal data.
- **Our Role:** We act as a Data Processor, providing the technical infrastructure (AT Cloud, Mobile App) to facilitate the file transfer between You and Your End-Customer.
- **Responsibility:** You are responsible for ensuring Your End-Customers have consented to the processing of their VIN and vehicle data before using the tool.

## 6. DATA RECIPIENTS AND SUB-PROCESSORS

We do not sell Your data. We share data only with trusted third parties necessary to operate Our business:

1. Cloud Infrastructure: Google Cloud Platform (GCP) (for cloud servers).
2. Payment Processors: Stripe, PayPal (for processing payments).
3. Invoice software: Zoho (invoice management).
4. Customer Support: Intercom (for ticketing and chat support).
5. Logistics: DHL (for shipping hardware).
6. Administrative: Public authorities or external auditors, only when required by Luxembourgish law.

**International Transfers:** Some of Our service providers (e.g., Stripe, Zoho, Intercom) are based in the United States. Transfers to these entities are protected by the **EU-US Data Privacy Framework (DPF)** or Standard Contractual Clauses (SCCs) to ensure Your data remains protected to GDPR standards.

## 7. DATA RETENTION

We retain Your Personal Data only for as long as necessary:

- **Active Accounts:** Data is retained indefinitely while Your Account is active to provide lifetime updates and license verification.
- **Commercial Documents:** Invoices and accounting records are retained for **ten (10) years** after the close of the financial year, in strict compliance with Article 16 of the Luxembourg Commercial Code.
- **Inactive/Closed Accounts:** Operational data (e.g., logs, history) is deleted or anonymized **24 months** after the termination of the contract (Account closure) to handle any subsequent warranty claims.

## 8. YOUR RIGHTS

Under the GDPR, You have the following rights:

- **Right of Access:** You may request a copy of the data We hold about You.

- **Right to Rectification:** You may correct inaccurate data via Your Account settings. *Note: Changing the email address linked to a Tool is considered a "Transfer of Ownership" and is subject to the fees and procedures outlined in the Terms of Service.*
- **Right to Erasure ("Right to be Forgotten"):** You may request the deletion of Your Account. **WARNING:** Deletion of Your Account will result in the immediate and permanent deactivation of Your AutoTuner Tool and the forfeiture of Your software license. This action is irreversible.
- **Right to Object:** You may opt-out of marketing communications at any time.
- **Right to Data Portability:** You may request Your personal data in a structured, machine-readable format. *Note: This applies to data You provided. It does not apply to proprietary encrypted binaries generated by Slave tools.*

To exercise these rights, please contact us at: **dpo@fr-team.lu**.

## 9. SECURITY

We employ industry-standard technical and organizational measures (TOMs) to protect Your data, including:

- **Encryption:** Data is encrypted in transit (TLS 1.2+) and at rest (AES-256).
- **Hardware Security:** The AutoTuner Tool utilizes a dedicated architecture with secure boot and anti-tamper mechanisms to prevent unauthorized data access.
- **Access Control:** Access to AT Cloud backend systems is restricted to authorized personnel via Multi-Factor Authentication (MFA).

## 10. COOKIES

Our website uses cookies to function.

- **Essential Cookies:** Required for login and security. These cannot be disabled.
- **Analytics Cookies:** Used to understand website usage. You can consent to or reject these via the cookie banner upon Your first visit.

## 11. SUPERVISORY AUTHORITY

If You believe Your rights have been violated, You have the right to lodge a complaint with the Luxembourgish supervisory authority:

**Commission Nationale pour la Protection des Données (CNPD)**

15, Boulevard du Jazz

L-4370 Belvaux

Luxembourg

Website: [www.cnpd.lu](http://www.cnpd.lu)

**12. CHANGES TO THIS POLICY**

We reserve the right to modify this Policy at any time to reflect changes in our Products, technology, or the law. Material changes will be notified to You via email or a dashboard notification. Your continued use of the Services after such changes constitutes Your acceptance of the updated Policy.