

# Privacy Policy

Last updated: 29 May 2026

This privacy policy describes how SUPERTRACK ApS (“SuperTrack”, “we”, “us”) processes personal data in connection with the use of the SuperSail solution, including our apps, systems and related services (the “Service”).

We attach great importance to protecting your personal data and process it in accordance with the General Data Protection Regulation (GDPR) and the Danish Data Protection Act.

## 1. Data controller and contact details

### Data controller:

SUPERTRACK ApS  
CVR no.: 35 20 90 18  
Skæringvej 92, 1.  
8250 Egå  
Denmark

### Contact person for data protection:

Name: Carsten Mølgaard  
E-mail: cmp@super-sail.dk  
Phone: +45 24 79 74 44

If you have any questions about this privacy policy or about our processing of your personal data, you can contact us using the contact details above.

## 2. Which personal data we process, for what purposes and on what legal basis

### 2.1 Creation and use of the SuperSail Owner’s App (including telemetry and GPS)

When you as a yacht owner (the “Owner”) or as a user created by the Owner use the SuperSail Owner’s App, we process, among other things:

#### Contact details:

E-mail address (login)

Mobile numbers (up to 4 per boat)

#### Account and login data:

Username / e-mail

Encrypted password

Information about logins and user activity (audit log)

#### Technical operational data about the boat and equipment (telemetry):

Engine data

Electrical data

Operating hours

Sensor data (e.g. movement, water in the boat, battery status)

**Location data:**

Boat position / GPS history

**Device information:**

Type of mobile phone, operating system, etc.

**Purposes:**

To create and manage your account and provide you with access to the app.

To provide the functionalities of the Service, including displaying technical data, alerts, history and service information.

To monitor and improve the operation and security of the Service (logging, troubleshooting, abuse prevention).

**Legal basis (GDPR Art. 6):**

For functionalities that are necessary to provide and operate the Service for you as a customer:

Art. 6(1)(b) (necessary for the performance of a contract).

For additional processing for operation and security (logging, system monitoring, etc.):

Art. 6(1)(f) (legitimate interest in operating and securing the system and preventing abuse).

We do not use this information for targeted marketing unless you have given a separate consent for this.

**2.2 Cameras on the boat (SuperSail camera function)**

If camera(s) connected to the SuperSail system are installed, the following additional processing may take place:

Live images from the camera(s)

Recordings (video) stored locally on the camera's SD card (typically for up to 30 days)

**Who can view the cameras?**

As a rule, only the Owner and those users to whom the Owner has granted camera access in the app.

The yard/dealer may, in certain phases, have access to cameras via Vortex Cloud, but this access is controlled by SuperTrack and is limited to cameras that have not yet been handed over to the Owner.

SuperTrack and our selected development consultants have the technical ability to access camera live streams via Vortex Cloud and relevant APIs, but may only do so when necessary for troubleshooting or support and in accordance with our internal camera access policy.

**Purposes:**

To allow the Owner and the Owner's users to view live images and recordings from the boat via the app.

To enable limited technical support and troubleshooting of cameras (for example in case of errors, image issues, etc.).

**Legal basis (GDPR Art. 6):**

For the use of cameras as part of your use of the Service:

Art. 6(1)(b) (necessary for the performance of a contract, where the camera function is part of the agreed solution).

For SuperTrack's limited access to cameras in support and troubleshooting situations:

Art. 6(1)(f) (legitimate interest in being able to correct errors and secure the Service), limited and restricted by our internal camera access policy.

We recommend that you as Owner inform persons on board (family, crew, guests, etc.) that there are cameras on the boat and how they are used.

### **2.3 Customer administration and invoicing**

In connection with customer administration and invoicing, we process, among other things:

Name

Address

Contact details (e-mail, phone)

Information about services/subscriptions

Invoice and payment information

**Purposes:**

To administer customer relationships, including issuing invoices and performing bookkeeping.

To comply with our legal obligations under accounting and tax legislation.

**Legal basis (GDPR Art. 6):**

Art. 6(1)(b) (performance of a contract).

Art. 6(1)(c) (necessary for compliance with legal obligations, e.g. under the Danish Bookkeeping Act).

## **2.4 Support and troubleshooting**

In connection with support and troubleshooting, we process, among other things:

System ID

Contact details of the person contacting us (e.g. e-mail)

The information you provide in your enquiry

Technical data from the system (including logs) and, in special cases, temporary access to camera live streams

### **Purposes:**

To be able to respond to enquiries, correct errors, document support cases and improve the Service.

### **Legal basis (GDPR Art. 6):**

Art. 6(1)(b) (performance of a contract).

Art. 6(1)(f) (legitimate interest in ensuring good support, quality and secure operation).

## **2.5 HR and consultants**

For our own employees and consultants, we process ordinary HR data (contact information, salary/fees, etc.) in accordance with the relevant contracts and legal requirements. These processing activities are described in our internal HR documentation and are not detailed in this privacy policy, which is aimed at users of SuperSail.

## **3. Sources of personal data**

We collect personal data:

directly from you (for example when you create an account, enter contact details, or contact support),  
automatically through your use of the Service (telemetry, GPS, sensor data, technical logs, camera data),

in some cases from the yard/dealer in connection with system setup and initial Owner access.

## **4. Recipients and processors**

All processors are subject to data processing agreements or equivalent terms obliging them to protect personal data and only process it in accordance with our instructions.

We only disclose personal data where this is necessary for the purposes described above and where there is a valid legal basis.

Typical recipients/processors include:

**Hosting partner:** Sentia (hosting and operation of servers and databases in the EU).

**Camera and cloud provider:** VIVOTEK/VORTEX (operation of the camera platform and VORTEX Cloud in connection with the camera function in SuperSail). For the SuperSail setup, we have chosen Germany as the data center region in VORTEX.

**Auditor/bookkeeping and finance/accounting systems:** for accounting and audit purposes.

**Development and support consultants:** who assist us with development, operation and support and act in accordance with our instructions.

## 5. Transfers to third countries

We use VIVOTEK/VORTEX as a technical provider for the camera function in SuperSail. In their standard setup, data may be stored in various countries (including the USA, Germany, Australia and Japan), and certain user data is, as a starting point, stored in the USA.

For SuperSail we have actively chosen Germany as the data center region in VORTEX. This means that storage, backup and other processing of personal data in the SuperSail solution take place in data centers within the EU/EEA. On this basis, we do not, as a general rule, transfer personal data to countries outside the EU/EEA (third countries).

However, in special situations there may be a potential third-country risk. This may be the case in particular if VIVOTEK/VORTEX or their sub-processors provide remote support from countries outside the EU/EEA and thereby gain access to data, even though the servers are physically located in Germany. In such cases, the access is considered a transfer to third countries, and we ensure that an appropriate transfer mechanism is used and that any necessary supplementary safeguards are implemented.

## 6. Storage and deletion

We only store personal data for as long as necessary for the purposes for which it was collected, or for as long as we are legally obliged to do so.

In general, the following applies:

**Camera recordings:** stored locally on the camera's encrypted SD card and automatically deleted/overwritten after no more than 30 days, unless recordings are specifically extracted in connection with a dispute or report.

**GPS and route history:** as a rule kept for up to 5 years; however, we continuously assess whether there is still a legitimate and necessary need to retain GPS data and route history and delete or anonymize data when it is no longer necessary for the purposes described above.

**Telemetry and operational data:** as a rule kept for up to 5 years from registration for troubleshooting and documentation of service; thereafter data is anonymized or deleted unless longer retention is necessary in a specific case.

**User profiles and login information:** kept for as long as the account is active and up to 12 months after closure, after which they are deleted or anonymized, unless longer retention is necessary in connection with a specific dispute.

**Audit logs (logins, changes to rights, camera access):** stored for up to 12 months and then deleted, unless the logs form part of a specific investigation or dispute.

**Accounting records:** stored in accordance with the Danish Bookkeeping Act (typically 5 years from the end of the financial year).

## 7. Your rights

Under the data protection rules, you have a number of rights in relation to our processing of your personal data:

**Right of access:** you can obtain information about which personal data we process about you.

**Right to rectification:** you can have inaccurate or incomplete data corrected.

**Right to erasure (“right to be forgotten”):** in certain cases, you can have data about you deleted.

**Right to restriction of processing:** in certain cases, you can have the processing of your data restricted.

**Right to object:** you can object to our processing that is based on legitimate interests.

**Right to data portability:** in certain cases, you can receive your data in a structured, commonly used and machine-readable format.

Where the processing is based on consent, you have the right to withdraw your consent at any time. Withdrawal does not affect the lawfulness of processing based on consent before its withdrawal.

If you wish to exercise your rights, you can contact us using the contact details set out in section 1.

## 8. Complaint to the Danish Data Protection Agency

If you are dissatisfied with the way we process your personal data, you are very welcome to contact us first so that we can try to resolve the issue.

You also have the right to lodge a complaint with:

Danish Data Protection Agency  
Carl Jacobsens Vej 35  
2500 Valby  
Denmark

Phone: +45 33 19 32 00

E-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

Website: [www.datatilsynet.dk](http://www.datatilsynet.dk)

## **9. Changes to this privacy policy**

We may update this privacy policy from time to time. In the event of material changes, we will notify you via the app, by e-mail, or in another appropriate manner.

The version in force at any given time will be available via our website and in the app.

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