

Privacy Policy

Version 2.5 · Effective 2026-09-27

<https://www.sandhed.com/privacy>

Last updated: September 27, 2026. This Privacy Policy explains how we collect, use, and protect your personal data when you use the Sandhed platform.

1. Introduction

Sandhed Group Ltd ("Sandhed", "we", "us", or "our"), a company registered in Malta, operates the Sandhed IoT Digital Twin platform (the "Service"). This Privacy Policy describes how we collect, use, disclose, and protect personal data in connection with our Service.

We are committed to protecting your privacy and processing your personal data in accordance with the EU General Data Protection Regulation (GDPR) and other applicable data protection laws. If you have any questions about this Privacy Policy, please contact us at legal@sandhed.com.

2. Data Controller

Sandhed Group Ltd is the data controller for personal data we collect directly from you (such as account registration information and usage data).

For personal data that Customers upload or transmit through the Service (including IoT telemetry data and warehouse management data that may contain personal information), the Customer is the data controller and Sandhed acts as a data processor on behalf of the Customer. The processing of such data is governed by our Data Processing Agreement.

3. Personal Data We Collect

We collect the following categories of personal data:

3.1 Account Information

- Name and email address
- Company/organization name
- Job title or role
- Profile picture
- Language preference
- Account credentials (passwords are stored in hashed form)

3.2 Usage Data

- Login times and session duration
- Features accessed and actions performed
- IP addresses

- User preferences and settings
- AI Co-Pilot queries and interaction metadata (see Section 5.5)
- Analytics events and masked session recordings, only with your consent (see Section 5.4)

3.3 Device Information

- Browser user-agent string (which includes browser type, version, and operating system)
- Device type and screen resolution

3.4 IoT and Telemetry Data

When Customers use our Service to process IoT telemetry data, this data may include:

- Equipment location coordinates from RTLS and GPS systems
- Equipment status, sensor readings (temperature, humidity, battery level, etc.)
- Engine hours, fuel consumption, and maintenance indicators (via AEMP/ISO 15143-3)
- AirTag and Apple Find My location data (when configured)
- Device IP addresses (stored encrypted)

Sandhed processes this data on behalf of the Customer as a data processor. The Customer is responsible for ensuring that any personal data included in telemetry feeds is processed in compliance with applicable data protection laws.

RTLS and Location Tracking: Where Customers deploy real-time location systems (RTLS) that track the location of individuals, the Customer is solely responsible for providing appropriate notice and obtaining any required consent from individuals being tracked.

3.5 Warehouse Management Data

When Customers connect warehouse management systems (WMS) to the Service, the following data may be ingested:

- Employee identifiers, usernames, and full names
- Work location and department assignments
- Daily productivity metrics
- Inventory data (SKU, quantity, location, cost)
- Warehouse movement and audit records

Sandhed processes WMS data solely as a data processor on behalf of the Customer. The Customer, as the data controller, is responsible for ensuring a valid legal basis for sharing employee data with the Service and for providing appropriate notice to employees.

3.6 User-Uploaded Content

- Floor plan images and facility layouts
- Service documentation, photos, and certificates
- Custom asset images

3.7 Billing and payments

We process your company name, billing address, VAT number, contact details, subscription, invoices and payment status to administer the agreement and meet our legal obligations. Stripe processes payment information and provides payment, invoicing and fraud-prevention services. Sandhed does not store full card numbers or card verification codes. Stripe acts as a processor or an independent controller depending on the processing purpose, as described in its privacy terms.

Sandhed Group Ltd. is established in Malta. Invoices, VAT information and supporting accounting records are retained for the periods required by applicable Maltese tax and accounting law, including after a subscription ends. This retention covers only the necessary records and does not extend retention of all Customer Data.

4. Legal Basis for Processing

Under GDPR Article 6, we process personal data based on the following legal grounds:

- Contract Performance (Art. 6(1)(b)): Processing necessary to provide the Service and fulfill our contractual obligations to you
- Legitimate Interests (Art. 6(1)(f)): Processing for security, fraud prevention, and service improvement, where our interests do not override your rights. We do not rely on this basis for analytics or session recordings (see Section 5.4)
- Consent (Art. 6(1)(a)): For analytics and session recordings where you have accepted them in our cookie banner (see Section 5.4), and for optional AI-powered features and marketing communications where we have obtained your explicit consent
- Legal Obligation (Art. 6(1)(c)): Processing required to comply with applicable laws and regulations

5. How We Use Your Data

We use personal data for the following purposes:

5.1 Providing the Service

- Creating and managing your account
- Authenticating your access to the platform
- Processing and displaying your IoT data
- Processing warehouse management data when configured by Customer
- Sending service-related notifications and alerts
- Sending the administrators of a new account a few setup tips by email during its first month. Every such email has a link to stop them.

5.2 Security and Fraud Prevention

- Detecting and preventing unauthorized access
- Monitoring for security threats
- Investigating potential violations of our Terms of Service

5.3 Customer Support

- Responding to your inquiries and support requests
- Providing technical assistance

5.4 Analytics and Improvement

We use analytics to understand how our website, the Service, prospect demos and our documentation site are used, to identify areas for improvement and to develop new features and functionality. Sandhed is the controller for this analytics. Analytics data is not Customer Data and is not processed on the Customer's behalf. We do not sell analytics data or use it for advertising.

Only with your consent: We collect analytics and session recordings only if you accept analytics in our cookie banner (Art. 6(1)(a) GDPR). One choice applies to www.sandhed.com, app.sandhed.com (including prospect demos) and docs.sandhed.com, and is stored in the `sh_consent` cookie (see Section 10). On app.sandhed.com and docs.sandhed.com we ask again if your choice was made against an earlier version of the banner text. You can withdraw consent at any time through "Cookie preferences" on app.sandhed.com and docs.sandhed.com, or with the cookie button on our Cookie Policy page. A withdrawal on one of these sites applies to all of them. It stops further collection and does not affect processing that took place before it. If your browser sends a Do Not Track signal, we treat it as a refusal and collect no analytics, even if you have accepted. Until you accept, none of these sites loads or contacts PostHog. Accepting the Terms of Service on a demo welcome screen is not consent to analytics.

Website: On www.sandhed.com, PostHog records page views and when you leave a page and, where self-service signup is offered, the signup and subscription measurement described in our Cookie Policy. PostHog keeps a random identifier in a cookie and in local storage in your browser.

Service: When you are signed in to an organization's Service, the app records that a session started, which broad area of the Service was opened (for example Live View, assets, alerts, service, documents or settings) and how floor navigation was used: which control switched floors, which floor view mode was shown and whether a floor transition was interrupted. Each event also shows whether the user is a Sandhed platform administrator.

Prospect demos: In a Sandhed prospect demo, the app records which demo areas you open; which guided-tour steps you view, use or dismiss; how you use the prepared AI suggestions and questions, including whether an answer cited evidence and how many sources it cited, but not the question or the answer; and whether you create an issue, open the Exact Registry match, view the demonstrated outcome or select "Plan the next step with Sandhed". It also records your first and later visits to the demo. Each event carries the demo's identifier, the demo template and its version, the feature profile and whether the viewer is a prospect or Sandhed staff. Sandhed can link the demo identifier to the organization the demo was prepared for, but PostHog does not receive your name, email address or user account. If you have accepted analytics, our own systems also record against your user account when you reach four demo milestones: an AI answer with cited evidence, opening the Exact Registry match, viewing the demonstrated outcome and selecting "Plan the next step with Sandhed". We use these records to follow up on the demo. Separately, our servers send PostHog events about the demo environment itself when it is prepared and checked. These contain no information about a person.

Documentation site: On docs.sandhed.com, PostHog records page views; searches, with the number of results, the language and the section filter, but not the words you searched for; and whether you signed in to the documentation with a link or a code, or asked for a sign-in link or for access. These events include standard browser information: browser, operating system, device type, screen and window size, time zone, browser language, the browser user-agent string and the address of the page without any query string.

Session recordings: On www.sandhed.com and docs.sandhed.com, and only after you accept analytics, we record how pages are used so that we can find usability problems. Recordings are masked in your browser before anything is sent: all text on the page and everything you type are hidden, and images, video, audio, embedded frames and

canvases are replaced by empty boxes of the same size. A recording therefore shows the layout of the page, link addresses and the file names of page resources, mouse movement, clicks, scrolling and window size, but not what the page said or what you entered. Console logs and the contents and headers of network requests are not recorded, and page and request addresses are cut to the site and path. Recording stops when you withdraw consent. The Service and prospect demos are never recorded.

What analytics does not contain: Service and demo events are limited to a fixed list of event types and values. Anything else, including page addresses, referrers and browser or device details, is removed in the browser before an event is sent. They do not contain names, email addresses, company names, user or organization account identifiers, site or asset identifiers, typed AI questions, AI answers, Memory content, document names or content, or issue text. Documentation site events do not contain search words or email addresses. None of our sites uses automatic click capture or surveys.

Identifiers, profiles and location: In the Service, prospect demos and the documentation site, the analytics identifier is random, is created when analytics starts, exists only in the browser's memory and is replaced when you reload the page or open a new tab. It is not linked to your user account or your organization. Every event we send, including recordings, instructs PostHog not to create a person profile and not to derive a location from your IP address. PostHog receives the IP address of your device with each request, as any web service does. Our PostHog project is set to discard it, so it is not stored with the events. PostHog stores our analytics in the EU (Frankfurt, Germany).

5.5 AI-Powered Features

The Service includes an optional AI Co-Pilot feature that uses the Google Gemini API to provide operational insights and task assistance. When AI-powered features are enabled:

- Queries are sent to the Google Gemini API for processing. Google processes this data in accordance with its own privacy policies and data processing terms.
- We log interaction metadata including user ID, organization, model used, token count, and response duration for monitoring and billing purposes.
- Conversation content is not stored by Sandhed after the session ends.

Organization administrators can enable or disable AI-powered features for their organization at any time. AI features are disabled by default.

Sandhed does not use Customer Data or AI interaction data to train AI models.

6. Data Sharing

We may share personal data with the following categories of recipients:

6.1 Sub-Processors

We use the following third-party service providers to help operate our Service:

- Railway — Application hosting and database infrastructure (EU/US)
- Cloudflare R2 — File and object storage (EU)
- Cloudflare Turnstile — protects the signup form against automated abuse by checking signals from your browser. Its use is governed by Cloudflare's Turnstile Privacy Addendum (global)

<https://www.cloudflare.com/turnstile-privacy-policy/>

- Google LLC (Gemini API) — AI-powered features (US)
- Resend — Transactional email delivery (US)
- LocationIQ — Geocoding and reverse geocoding (EU/US)

- PostHog — Consent-based analytics for our website, the Service, prospect demos and our documentation site, and masked session recordings on our website and documentation site (EU, Frankfurt)

When Customers configure integrations, the following additional sub-processors may receive data:

- Trackunit — Heavy equipment telematics
- SmartPack — Container and cargo tracking
- Apple (Find My network) — AirTag location tracking
- Customer-specified RTLS vendors — Real-time location systems

All sub-processors are bound by data processing agreements and are required to protect your data in accordance with applicable laws. Sandhed will notify Customers of any new sub-processors at least 30 days before engagement, and Customers may object to such changes for legitimate data protection reasons.

6.2 Legal Requirements

We may disclose personal data if required by law, court order, or other legal process, or if we believe disclosure is necessary to protect our rights, property, or safety, or that of others.

6.3 Business Transfers

If Sandhed is involved in a merger, acquisition, or sale of assets, your personal data may be transferred as part of that transaction. We will notify you of any such change and any choices you may have regarding your data.

7. International Transfers

Sandhed is based in the European Union (Malta), and we primarily process personal data within the EU/EEA. Where we transfer personal data outside the EU/EEA, we ensure appropriate safeguards are in place, including:

- EU Standard Contractual Clauses (SCCs)
- Adequacy decisions by the European Commission
- EU-US Data Privacy Framework certifications where applicable
- Other approved transfer mechanisms under GDPR

8. Data Retention

We retain personal data for the following periods:

- Account Data: Duration of your account plus 90 days after account closure
- Usage and Audit Logs: 12 months from collection
- AI Interaction Metadata: 12 months from collection
- Analytics Events: 12 months from collection
- Session Recordings: 30 days from recording
- WMS Employee Snapshots: Duration of integration plus 90 days after disconnection
- IoT Telemetry Data: As configured by Customer, default 12 months
- Uploaded Files: Duration of account, deleted within 30 days of account closure
- Backup Retention: 30 days after deletion from active systems
- Support Records: 3 years from resolution for quality and legal purposes

We may retain certain data longer if required by law or for legitimate business purposes (such as resolving disputes or enforcing our agreements).

9. Your Rights Under GDPR

As a data subject, you have the following rights regarding your personal data:

- Right of Access (Art. 15): Request a copy of the personal data we hold about you
- Right to Rectification (Art. 16): Request correction of inaccurate or incomplete data
- Right to Erasure (Art. 17): Request deletion of your personal data ("right to be forgotten")
- Right to Data Portability (Art. 20): Receive your data in a structured, machine-readable format
- Right to Restriction (Art. 18): Request limitation of processing in certain circumstances
- Right to Object (Art. 21): Object to processing based on legitimate interests
- Right to Withdraw Consent: Where processing is based on consent, you may withdraw it at any time

To exercise any of these rights, please contact us at legal@sandhed.com. We will respond to your request within 30 days.

WMS Employee Data: If your personal data is processed through the Service because your employer has connected a warehouse management system, you should contact your employer (the data controller) in the first instance to exercise your data protection rights. Sandhed will assist your employer in responding to your request as required under our Data Processing Agreement.

Analytics: You can withdraw your analytics consent at any time as described in Section 5.4. Analytics events and session recordings are not linked to your name, email address or user account, and PostHog keeps no profile of you, so in most cases we cannot identify which events or recordings relate to you (GDPR Article 11). If you give us additional information that allows us to identify them, we will handle your request. Demo milestone records linked to your user account (see Section 5.4) are covered by your rights in the same way as your other account data.

Right to Lodge a Complaint: You have the right to lodge a complaint with a supervisory authority. In Malta, this is the Office of the Information and Data Protection Commissioner (IDPC).

10. Cookies and Tracking Technologies

We use cookies and similar technologies for the following purposes. For full details, see our Cookie Policy.

10.1 Essential Cookies

Required for the Service to function, including:

- Session management and authentication tokens
- Language preference cookie (NEXT_LOCALE)
- Content security policy tokens
- Your cookie and analytics choice (sh_consent), shared by www.sandhed.com, app.sandhed.com and docs.sandhed.com

These cookies cannot be disabled.

10.2 Analytics Cookies

On www.sandhed.com, we use PostHog analytics cookies and local storage only if you accept analytics in the cookie banner. They are never loaded by default. In the Service, prospect demos and the documentation site, analytics sets no cookie and uses no local or session storage. Its identifier exists only in the browser's memory while the page is open. See our Cookie Policy for details and instructions for changing your preferences.

11. Security

We implement appropriate technical and organizational measures to protect personal data, including:

- Encryption of data in transit using TLS 1.2 or higher
- AES-256-GCM encryption for sensitive credentials (API tokens, integration credentials, device addresses)
- Database infrastructure encryption at rest provided by our hosting provider
- Role-based access controls with four permission levels
- Comprehensive audit logging
- Incident response procedures

While we strive to protect your personal data, no method of transmission or storage is 100% secure. If you have reason to believe your data has been compromised, please contact us immediately.

12. Children's Privacy

The Service is not intended for use by children under the age of 16. We do not knowingly collect personal data from children under 16. If we become aware that we have collected personal data from a child under 16, we will take steps to delete such data promptly.

13. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices or for legal, operational, or regulatory reasons. We will notify you of material changes by:

- Posting the updated policy on our website
- Sending you an email notification
- Displaying a notice within the Service

We encourage you to review this Privacy Policy periodically. Your continued use of the Service after changes become effective constitutes acceptance of the updated policy.

14. Contact Information

For questions about this Privacy Policy or our data practices, please contact us:

Sandhed Group Ltd Email: legal@sandhed.com

This Privacy Policy is effective as of September 27, 2026 and applies to all users of the Sandhed platform operated by Sandhed Group Ltd.

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