TerraRad Tech AG – Privacy Policy

Last updated: 28 November 2025

At TerraRad Tech AG we are committed to protecting your privacy and handling your personal data responsibly. This Privacy Policy explains how **TerraRad Tech AG** ("**TerraRad**", "**we**", "**us**", "**our**") collects, uses, and protects personal data when you:

- visit our websites, including www.terraradtech.com and www.turfrad.com;
- use the turfRad web-based platform, including app.turfrad.com and portal.turfrad.com; and
- use the turfRad mobile application to configure TerraRad sensors and access certain platform features

(collectively, the "**Services**").

This Privacy Policy applies in addition to any applicable contractual terms, including the turfRad Service & License Agreement and the turfRad Mobile App End User License Agreement (EULA).

1. Who We Are and Contact Details

Data controller (for most processing covered by this Policy):

TerraRad Tech AG

Hohlstrasse 190

8004 Zürich

Switzerland

E-Mail: info@terraradtech.com

Our customers and users are located worldwide, including in the United States, the EU/EEA, the United Kingdom, and Switzerland. This Privacy Policy explains how we handle personal data in a way that is intended to comply with Swiss data protection law and, where applicable, the EU/EEA and UK data protection regimes, while also describing our practices for users in other countries.

For most processing activities described in this Privacy Policy, TerraRad acts as a data controller under the Swiss Federal Act on Data Protection (FADP), the EU General Data Protection Regulation (GDPR), and, where applicable, the UK GDPR.

In some situations – especially where we process personal data contained in Customer Content solely on behalf of a business customer – we may act as a data processor. In those cases, our processing is governed by the applicable service agreement with that customer.

2. Scope and Relationship to Our Contracts

This Privacy Policy covers personal data processed in connection with:

- our **websites** (terraradtech.com, turfrad.com);
- the **turfRad platform** (including web portals at app.turfrad.com and portal.turfrad.com); and
- the **turfRad mobile app** used to configure sensors over Bluetooth and set network / home-location parameters.

Where you or your organization have entered into the **turfRad Service & License Agreement** (the "Service Agreement"), that contract defines certain data categories such as:

- **Account Data**
- **Customer Content**
- **Sensor Data**
- **Derived Data**
- **Usage Data**

This Privacy Policy is intended to be consistent with those definitions. If you have any questions about how this Privacy Policy interacts with your contract, please contact us.

In case of any inconsistency between this Privacy Policy and the turfRad Service & License Agreement or EULA regarding the legal basis for processing or the allocation of responsibilities between TerraRad and a customer, the contractual terms will prevail to the extent they are more specific, while this Privacy Policy explains how we implement those terms in practice.

3. Personal Data We Process

The personal data we process depends on how you interact with us.

3.1 Website visitors

When you visit our websites, we may process:

- **Identification and contact data**
    - name, email address, phone number, company, role (when you fill out contact forms, sign up for a newsletter, or request a demo);

- **Technical data**
    - IP address, browser type and version, operating system, device type, date and time of access, pages viewed, referring URL;
- **Usage data**
    - how you navigate our websites (which pages you visit, how long you stay, clicks), in aggregated form;
- **Communications data**
    - any information you choose to provide in contact forms, support requests, or email messages.

3.2 turfRad platform users (portal)

When you or your organization create and use a turfRad account on app.turfrad.com or portal.turfrad.com, we may process:

- **Account and profile data**
    - name, business email, phone number, organization name, job title or role, time zone, language preferences;
    - usernames and **hashed** passwords or other authentication credentials;
- **Account configuration and course/facility data**
    - course or facility names, internal labels, configuration preferences, and similar business-related data;
- **Platform usage and log data** (a form of Usage Data)
    - login times, IP addresses, device information, actions performed in the portal (e.g. pages or features used), error logs;
    - timestamps and metadata for maps, exports, and other actions, to ensure security, troubleshoot issues, and improve the service.

3.3 Mobile app users (configuration app)

When you use the **turfRad mobile app** (for example, to configure a sensor), we may process:

- **Device information**
    - device model, operating system version, app version, language;
- **Bluetooth and configuration data**
    - technical information required to discover and connect to TerraRad sensors via Bluetooth;
    - configuration parameters you provide, such as the sensor's reference or "home" location, naming, and similar metadata;

- **Network configuration data**
    - WiFi-related information you enter when configuring a sensor (e.g. SSID, and possibly password or other credentials), to allow the sensor to connect to your network and the turfRad platform.

If WiFi credentials are processed, they are used solely for configuration purposes. We do not use WiFi credentials for marketing or profiling. Where technically feasible, these credentials are stored only on your device and/or the sensor, and not retained in TerraRad's back-end systems.

You are responsible for ensuring that you are authorized to configure the device and network you use, and for the accuracy of the configuration data you provide.

3.4 Sensor and operational data

When TerraRad sensors are deployed and connected to the turfRad platform, they generate **technical and environmental data** such as:

- raw measurements and signals (e.g. soil moisture readings);
- telemetry and status information;
- timestamps and geospatial coordinates (e.g. where measurements are taken on a course);
- device identifiers and firmware versions.

We generally treat this as **non-personal** or **technical** data ("Sensor Data" in the Service Agreement). However, it may be linked to an account, user, or facility and therefore indirectly relate to individuals. We use this data to:

- provide maps, analytics, and other outputs ("Derived Data") in the turfRad platform;
- operate, maintain, and improve the Services; and
- generate aggregated or de-identified statistics and models.

We do not use Sensor Data to profile individuals for marketing or unrelated purposes.

3.5 Customer Content

Our business customers may upload or provide **Customer Content** into the platform, which can include:

- maps, boundaries, and other geospatial information;
- sprinkler maps, fairway outlines, application zones;
- annotations, notes, and any other content they choose to store.

Customer Content is primarily technical / geospatial and business-related. However, it may occasionally contain personal data (for example, names included in notes or labels). In those cases, we process such personal data on behalf of the customer and in accordance with the applicable Service Agreement (acting as a **processor**).

3.6 Communications and support

If you contact us by email, phone, or support channels, we may process:

- your contact details;
- the content of your communication and any attachments;
- internal notes about the request and our responses.

We use this data to respond to your enquiries, provide support, and improve our services.

4. Purposes and Legal Bases for Processing

We process personal data for the following purposes and on the following legal bases (where GDPR/UK GDPR apply):

1. **Providing and operating the Services**
    - creating and managing accounts;
    - providing access to the turfRad platform and mobile app;
    - enabling configuration of sensors and generation of maps and analytics.

      Legal basis: performance of a contract (Art. 6(1)(b) GDPR) or taking steps at your request prior to entering into a contract.
2. **Customer service and support**
    - responding to enquiries, incidents, and support requests;
    - communicating about changes, maintenance, and updates.

      Legal basis: performance of a contract; legitimate interests (Art. 6(1)(f) GDPR) in providing high-quality support.
3. **Website and service improvement, analytics, and product development**
    - understanding how our Services are used;
    - monitoring performance and reliability;
    - improving user experience and developing new features;
    - using Sensor Data, Derived Data, and Usage Data in **aggregated or de-identified form** to develop, train, test, and improve algorithms, analytical models, and future products.

      Legal basis: legitimate interests (Art. 6(1)(f) GDPR) in operating and improving our Services.
4. **Marketing and communication**
    - sending newsletters or information about our products and services where you have subscribed;
    - contacting you as a representative of your organization based on your expressed interest.

      Legal basis: consent (Art. 6(1)(a) GDPR) where required; otherwise legitimate interests in promoting our Services.
5. **Security and fraud prevention**

- protecting our Services and users against abuse, misuse, and security incidents;
- detecting and investigating suspicious activity.

  Legal basis: legitimate interests in ensuring the security of our systems and Services; in some cases legal obligations.

6. **Compliance with legal obligations**
   - complying with bookkeeping, tax, export control, and other regulatory requirements;
   - responding to lawful requests from authorities.

     Legal basis: compliance with legal obligation (Art. 6(1)(c) GDPR).

Where we rely on **consent**, you may withdraw your consent at any time with effect for the future (for example, by unsubscribing from a newsletter).

5. Cookies and Similar Technologies

We use cookies and similar technologies on our websites and, in some cases, within the turfRad platform and mobile app. These may be:

- **Strictly necessary cookies** – required for basic functionality (e.g. login, security).
- **Functional cookies** – to remember preferences such as language.
- **Analytics cookies** – to understand how our Services are used (e.g. via Google Analytics).

Where required by law, we will obtain your **consent** for non-essential cookies via a banner or similar mechanism. You can also control cookies through your browser settings, and in some cases by installing opt-out tools provided by third parties (e.g. Google Analytics opt-out browser add-on).

6. How We Share Personal Data

We do not sell personal data. We may share personal data with the following categories of recipients, where necessary for the purposes described above:

1. **Service providers and subprocessors**
   - hosting and infrastructure providers;
   - email and communication tools;
   - customer relationship management (e.g. HubSpot or similar);
   - analytics providers (e.g. Google Analytics, subject to IP anonymization where configured);
   - support and ticketing systems;
   - error monitoring and logging tools.

These service providers process personal data on our behalf and are bound by appropriate contractual and security obligations.

2. **Distributors and partners**
    - in some cases we work with authorized distributors who sell hardware and may bundle access to the turfRad platform;
    - we may share limited account and usage information with such partners for activation, billing, or support where necessary.
3. **Professional advisers**
    - lawyers, auditors, accountants, or other professional advisers, where needed to protect our rights or comply with legal obligations.
4. **Authorities and legal proceedings**
    - if required by law or by a valid legal process (e.g. court order, government request);
    - to establish, exercise, or defend legal claims.
5. **Corporate transactions**
    - in connection with a merger, acquisition, restructuring, or sale of assets, personal data may be transferred as part of the transaction, subject to appropriate safeguards.

7. Third-Party Services and Plugins

We use certain third-party services and plugins to operate our websites and Services, manage customer relationships, and analyze usage. These providers may process personal data on our behalf or, in some cases, as independent controllers. Further information about international transfers and safeguards is set out in Section 8 (International Data Transfers).

7.1 HubSpot (CRM and Marketing)

We use HubSpot, a customer relationship management (CRM) and marketing platform provided by HubSpot, Inc. (25 First Street, 2nd Floor, Cambridge, MA 02141, USA), to manage customer interactions and communications.

HubSpot may process personal data such as:
- your contact details (e.g. name, email, organisation, role);
- information about your interactions with our websites and emails (e.g. page views, form submissions, email opens or clicks).

We use HubSpot to:
- manage leads and customer accounts;
- send newsletters and product information where permitted;
- understand which content and campaigns are effective.

HubSpot may transfer data to the United States. Where this involves personal data from Switzerland or the EU/EEA, we rely on appropriate safeguards such as the EU Standard Contractual Clauses and equivalent measures under Swiss and UK law. Further details about HubSpot's data practices are available in HubSpot's own privacy policy.

7.2 YouTube (Embedded Videos)

Our websites may include embedded videos from YouTube, a service of Google Ireland Limited (for users in the EU/EEA/CH/UK) or Google LLC (USA). When you access a page that contains an embedded YouTube video:
- a connection is established with YouTube/Google servers;
- YouTube/Google can see which page you visited and may set cookies or similar technologies.

If you are logged into your YouTube or Google account, YouTube/Google may associate this information with your account. You can prevent this by logging out of your YouTube/Google account before visiting our websites, or by adjusting your account and cookie settings. For more information, please see Google's privacy policy.

7.3 Google Analytics (Website Analytics)

We use Google Analytics, a web analytics service provided by Google, to understand how visitors use our websites and to improve content and usability. Google Analytics uses cookies to collect information such as:
- pages visited;
- time spent on pages;
- technical information about your device and browser.

We configure Google Analytics with IP anonymization where available, so that your IP address is truncated before being stored. The information generated by the cookies is typically transmitted to and stored by Google on servers in the United States.

You can prevent Google Analytics from collecting your data by:
- refusing analytics cookies via our cookie banner (where available); and/or
- installing the Google Analytics opt-out browser add-on.

Further information is available in Google's own privacy documentation.

7.4 Social Media Plugins

Our websites may include plugins or links to social media platforms such as LinkedIn or X (formerly Twitter). When you interact with such plugins (for example by clicking a "Share" or logo button), the relevant provider may:
- receive information about your visit to our site; and
- associate this information with your user account if you are logged into that platform at the time.

These social media providers act as independent controllers for such processing. For more information about how they process personal data, please refer to the respective platform's privacy policy and your account settings.

8. International Data Transfers

We are based in Switzerland and may process personal data in Switzerland, the EU/EEA, the United Kingdom, the United States, and other countries.

Our core infrastructure for the turfRad platform is hosted on Microsoft Azure. Depending on the service and configuration, personal data may be stored and processed in data centres located in the EU/EEA or in the United States.

For transfers of personal data from Switzerland, the EU/EEA or the United Kingdom to countries that do not provide an adequate level of data protection under applicable law, we implement appropriate safeguards to protect your personal data, such as:

• EU Standard Contractual Clauses (SCCs) or equivalent contractual instruments;
• UK-approved international data transfer mechanisms;
• Swiss contractual clauses or equivalent safeguards; and/or
• other mechanisms recognised under applicable data protection law (for example, the EU-US and Swiss-US Data Privacy Frameworks for certified US organisations).

In particular, where we use Microsoft Azure and related services that involve transfers of personal data to the United States, we rely on Microsoft's participation in the relevant Data Privacy Framework(s) and on the data protection commitments (including SCCs) contained in Microsoft's Online Services Terms and Data Protection Addendum.

You may contact us if you would like more information about these safeguards or a description of how they apply to a specific transfer.

9. Data Security

We implement appropriate technical and organizational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access. These include, for example:

- secure hosting and access controls;
- encryption in transit (e.g. TLS/HTTPS) and, where appropriate, at rest;
- role-based access rights for our employees and contractors;
- logging and monitoring to detect unusual activity;
- regular updates and maintenance of systems;
- internal policies and training relating to data protection and security.

No system can be guaranteed 100% secure, but we strive to protect personal data in line with industry-standard practices.

10. Data Retention

We retain personal data only for as long as necessary for the purposes described in this Privacy Policy or as required by law. Retention periods depend on the type of data and context, for example:

- **Account and platform data** – kept for the duration of your or your organization's contract with us and thereafter for as long as necessary to comply with legal obligations (e.g. tax and accounting) or to resolve disputes;
- **Website analytics data** – retained for a limited period in aggregated or pseudonymized form;
- **Customer Content** – retained for the term of the Service Agreement and, after termination, managed in accordance with that agreement (for example, export options and subsequent deletion or anonymization);

- **Support and communications data** – retained as long as necessary to document interactions and improve support, or as required by law.

When data is no longer required, we will delete it or anonymize it so that it can no longer be associated with an identifiable individual.

11. Your Rights

Depending on where you are located and subject to applicable law (including FADP, GDPR, and UK GDPR), you may have the following rights with respect to your personal data:

- **Right of access** – to obtain confirmation as to whether we process personal data about you and, if so, access to that data and certain information.
- **Right to rectification** – to request correction of inaccurate or incomplete personal data.
- **Right to erasure** ("right to be forgotten") – to request deletion of your personal data in certain circumstances.
- **Right to restriction of processing** – to request that we restrict processing of your personal data in certain circumstances.
- **Right to data portability** – to receive personal data you have provided to us in a structured, commonly used, machine-readable format, and to transmit that data to another controller where technically feasible.
- **Right to object** – to object, on grounds relating to your particular situation, to processing based on our legitimate interests, and to object at any time to processing for direct marketing purposes.
- **Right to withdraw consent** – where processing is based on your consent, you may withdraw your consent at any time with effect for the future.

To exercise these rights, please contact us at **info@terraradtech.com**. We may need to verify your identity before responding to your request.

You also have the right to lodge a complaint with a competent data protection authority, in particular in the country where you live or work or where you consider that your rights have been infringed.

12. Children

Our Services are intended for use by businesses and professionals (e.g. golf course or sports facility staff) and are **not directed to children** under the age of 16. We do not knowingly collect personal data from children under 16. If you become aware that a child has provided us with personal data, please contact us and we will take appropriate steps to delete such data.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technologies, or legal requirements. When we do so, we will update the “Last updated” date at the top of this document. If the changes are material, we may also notify you through the Services (for example, via the portal or by email) where appropriate.

If this Privacy Policy forms part of a contract with you or your organization, changes may also be governed by the terms of that contract.

14. Contact

If you have any questions or concerns about this Privacy Policy or our data protection practices, or if you wish to exercise your rights, please contact:

TerraRad Tech AG

Hohlstrasse 190

8004 Zürich

Switzerland

E-Mail: info@terraradtech.com