

# Optrace Privacy and Cookies Notice

*Website, account, licensing and desktop application privacy information | Version 1.0*

|                          |                                                            |
|--------------------------|------------------------------------------------------------|
| <b>Company</b>           | Optrace Technologies Ltd (company number 17372443)         |
| <b>Registered office</b> | Kinlochard, The Purlieu, Malvern, United Kingdom, WR14 4DJ |
| <b>Effective date</b>    | 1 August 2026                                              |

## Purpose of this notice

This notice explains how Optrace Technologies Ltd collects and uses personal data through [optrace.pro](https://optrace.pro), Optrace accounts, subscriptions, licensing services, desktop applications, support, feedback, optional analytics and crash reporting. It also explains the cookies and similar technologies used by the website and connected services.

Optrace is designed to operate locally for motorsport telemetry and engineering data. Raw telemetry is not intended to be uploaded to Optrace merely because the desktop application is used. Online processing is used for accounts, subscriptions, licence validation, updates, downloads, support and optional diagnostics as described below.

## 1. Controller and contact details

Optrace Technologies Ltd is the controller for the personal data described in this notice. It is registered in England and Wales under company number 17372443. Registered office: Kinlochard, The Purlieu, Malvern, United Kingdom, WR14 4DJ. Website: <https://optrace.pro>. Privacy enquiries and requests may be sent to [privacy@optrace.pro](mailto:privacy@optrace.pro). General support enquiries may be sent to [support@optrace.pro](mailto:support@optrace.pro).

## 2. Scope and roles

### 2.1 Our controller activities

We act as controller for website visitors, account holders, prospective customers, subscribers, licence users, support contacts and people who opt into analytics or crash reporting.

### 2.2 Team and enterprise data

A team or enterprise customer may determine why and how it uses personal data about drivers, staff or customers inside Optrace. In that situation, the customer may be the controller and Optrace may be its processor only to the limited extent that data is transmitted to an Optrace-managed service. A separate data-processing agreement may be used where legally required.

## 2.3 Local files

Telemetry, setup records, driver profiles, strategy inputs, reports and imported files stored only on the user's device are controlled by the user or customer. Optrace Technologies Ltd does not receive them unless the user deliberately uploads or submits them.

## 3. Personal data we may collect

### 3.1 Account data

Email address, password authentication record, account identifier, display name where provided, company or team, country, account creation date, acceptance records, security and recovery information. Passwords are handled in protected hashed or authentication-provider form rather than being readable by Optrace.

### 3.2 Subscription and billing data

Subscription tier, status, start and expiry dates, trial status, usage allowance, billing interval, licence key, Stripe customer and subscription identifiers, payment status, invoice and transaction records. Stripe handles full payment-card details; Optrace does not ordinarily store them.

### 3.3 Licence and device data

Licence identifier, entitlement list, active-device count, device identifier, computer name where supplied, platform, application version, activation and validation times, last-seen time, offline-grace status and records of licence activation or revocation.

### 3.4 Website and security data

IP address, browser and device type, approximate location derived from IP where supplied, timestamps, requested pages, authentication events, failed login attempts, security logs and cookie or consent preferences.

### 3.5 Support and feedback data

Contact details, message content, attachments the user chooses to send, support history, diagnostic information and the response or outcome. Users should remove unnecessary personal, confidential or telemetry data before submission.

### 3.6 Optional local product analytics

When enabled in the desktop application, modules used, feature events, session duration and licence activation events are recorded locally on the user's device. These records are not automatically transmitted to Optrace and do not include raw motorsport telemetry, setup values, driver profiles, report contents or precise location.

### 3.7 Optional local crash reporting

When enabled in the desktop application, crash time, application version, operating system, error type, stack trace and limited technical context are recorded locally on the user's device. These records are not automatically transmitted to Optrace. A user may choose to send relevant diagnostic material when requesting support.

### 3.8 Marketing data

Communication preferences and records of product emails. Marketing is sent only where permitted by law and can be stopped at any time.

## 4. How we obtain personal data

- Directly from you when you register, subscribe, activate a device, contact support, send feedback or choose settings.
- From an organisation that authorises your team, enterprise, complimentary or beta access.
- Automatically from the website, authentication service, licensing service or desktop application when necessary to provide or secure them.
- From Stripe about payment and subscription status, without receiving full card information.
- From service providers that host, secure, distribute, update or diagnose the service, in accordance with their contracted roles.

## 5. Purposes and lawful bases

### 5.1 Accounts and service delivery - contract

To create and authenticate accounts, provide trials and subscriptions, validate licences, enable entitled features, manage devices, deliver downloads and updates, provide support and administer cancellation. This is necessary to enter into or perform the contract with an individual customer. For a business customer's personnel, legitimate interests may apply instead.

### 5.2 Payments and records - contract and legal obligation

To process orders, receive payment-status information, issue confirmations, manage refunds and cancellation, maintain accounting and tax records and establish transaction history.

### 5.3 Security and abuse prevention - legitimate interests and legal obligation

To protect accounts, customers, software, intellectual property and connected systems; enforce login-attempt and device limits; investigate misuse; preserve evidence; and meet applicable security obligations. Our legitimate interest is operating a secure, licensable commercial service.

### 5.4 Product operation and reliability - contract and legitimate interests

To diagnose errors, maintain compatibility, provide release notes, manage automatic updates and understand aggregate service performance using the minimum information reasonably necessary.

### 5.5 Optional local analytics and crash reporting - user choice

To help the user inspect feature use and diagnose crashes on their device. These features remain disabled until the user enables them and can be disabled through the application settings. Optrace processes the records only if the user deliberately submits them.

## 5.6 Support and feedback - contract and legitimate interests

To answer enquiries, investigate reported problems, improve Optrace and keep an appropriate history of the interaction. Our legitimate interest is providing reliable customer support and developing the product.

## 5.7 Legal claims and compliance - legal obligation and legitimate interests

To comply with law, respond to lawful requests, enforce agreements, manage complaints and establish, exercise or defend legal claims.

## 5.8 Marketing - consent or legitimate interests where permitted

To send relevant Optrace product and service communications. Each message will provide an easy way to opt out. We do not sell personal data for advertising.

# 6. Motorsport telemetry and engineering data

## 6.1 Local processing

CSV files, simulator feeds, UDP data, COM or serial data, OBD-II data, sensor streams, setups, driver profiles, strategy assumptions and reports are intended to be processed and stored locally by default.

## 6.2 No automatic raw-telemetry collection

We do not collect raw telemetry or detailed setup values through account validation. Local analytics and crash diagnostics do not automatically transmit records to Optrace and are designed not to include raw telemetry or account secrets.

## 6.3 Deliberate submission

If you attach telemetry, logs or reports to a support or feedback request, we process the submitted material to respond, investigate and improve the relevant issue. Do not submit third-party personal or confidential data unless you are authorised to do so.

## 6.4 Model improvement

Customer telemetry, driver profiles and setup data will not be used to train shared machine-learning models unless a separate, clear opt-in or written agreement identifies the data, purpose and applicable safeguards.

# 7. Who receives personal data

## 7.1 Service providers

We use contracted providers for website hosting and publication, authentication and databases, payment processing, email and workspace services, and software distribution. They process only the information needed for their service and are subject to their contractual and security terms.

## 7.2 Current core services

Optrace uses Framer for the public website, Supabase for account authentication, licensing and related backend records, Stripe for checkout, billing and subscription management, and the company's email or workspace provider for communications. Stripe-hosted pages operate under Stripe's own privacy and cookie information.

## 7.3 Professional and legal recipients

Information may be disclosed to insurers, auditors, accountants, legal advisers, potential purchasers under confidentiality, courts, regulators, law-enforcement bodies or other authorities where reasonably necessary and lawful.

## 7.4 Teams and organisations

If an account is managed by a team or enterprise, authorised administrators may see membership, licence, device, role, usage and subscription information associated with that organisation.

## 7.5 No sale of personal data

We do not sell personal data or share it with data brokers. We do not use raw motorsport telemetry for third-party advertising.

# 8. International transfers

Some providers may process personal data outside the United Kingdom. Where UK data-protection law requires safeguards, we will rely on an adequacy regulation, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another lawful transfer mechanism. Information about relevant safeguards may be requested from [privacy@optrace.pro](mailto:privacy@optrace.pro), subject to lawful confidentiality restrictions.

# 9. Retention

## 9.1 General rule

We keep personal data only for as long as reasonably necessary for the purpose collected, including service delivery, security, accounting, dispute resolution and legal obligations. We consider the amount, sensitivity, risk and applicable limitation periods when setting retention.

## 9.2 Account and licence records

Kept while the account or licence is active and afterwards for a limited period needed to address reactivation, security, fraud prevention, complaints and legal claims. Records that are no longer needed are deleted or anonymised.

## 9.3 Transaction records

Invoices, payments, refunds and related accounting records are generally retained for the period required by UK tax and company law, which is commonly at least six years from the relevant accounting period.

## 9.4 Security logs

Authentication, licence-validation and security logs are retained for a proportionate rolling period based on threat detection, investigation and operational requirements, then deleted or aggregated unless needed for an active incident or claim.

## 9.5 Support and diagnostics

Support messages, feedback and diagnostic files deliberately submitted to Optrace are retained only while useful for the request, product improvement or a legal claim. Local analytics, crash and feedback files remain under the user's control unless submitted. Submitted telemetry attachments are deleted when the support purpose is complete unless the customer agrees otherwise.

## 9.6 Backups

Deleted information may remain temporarily in encrypted backups until the backup cycle expires. It is protected from ordinary use and removed through the normal rotation process.

# 10. Security

We use proportionate technical and organisational measures intended to protect personal data, including access controls, authentication, encrypted network transport, provider security controls, separation of administrative access, logging, least-privilege access and managed backup or recovery measures where applicable. No internet or storage system can be guaranteed completely secure. Users must protect their credentials, devices and local telemetry files and should notify [support@optrace.pro](mailto:support@optrace.pro) promptly of a suspected compromise.

## 11. Automated decisions and entitlement controls

Optrace automatically enables or hides product functions according to subscription status, licence grants, usage allowances and device limits. These operational entitlement decisions are based on account and billing records. They are not intended to produce legal or similarly significant effects. If an entitlement appears incorrect, contact [support@optrace.pro](mailto:support@optrace.pro) for human review. Strategy predictions, setup recommendations and driver analyses support engineering decisions; they are not used by Optrace to make legal or similarly significant decisions about individuals.

## 12. Your data-protection rights

### 12.1 Available rights

Depending on the circumstances, you may have rights to be informed, access personal data, correct inaccurate data, erase data, restrict processing, object to processing, receive portable data and complain to a supervisory authority. Where processing relies on consent, consent may be withdrawn at any time without affecting prior lawful processing.

### 12.2 Objection

You have a right to object to direct marketing at any time. You may also object to processing based on legitimate interests; we will stop unless there are compelling legitimate grounds or the processing is needed for legal claims.

## 12.3 How to exercise rights

Email [privacy@optrace.pro](mailto:privacy@optrace.pro). State the account email and the right you wish to exercise. We may request proportionate evidence of identity to protect the account. We do not charge a fee unless a request is manifestly unfounded or excessive and the law permits a fee.

## 12.4 Complaints

Please contact us first so we can investigate. You may also complain to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/> or another competent supervisory authority.

## 13. Children

Optrace accounts and subscriptions are intended for adults and organisations. We do not knowingly permit a person under 18 to create an independent account. Data concerning a junior driver must be handled by an authorised adult, team or organisation with an appropriate legal basis and safeguards. Contact [privacy@optrace.pro](mailto:privacy@optrace.pro) if you believe a child has created an account or personal data has been supplied without proper authority.

## 14. Cookies and similar technologies

### 14.1 What they are

Cookies, local storage and similar technologies allow websites and connected services to remember information or recognise a browser. Desktop local configuration files used only on the user's device are not website cookies, but relevant device and licence identifiers are described elsewhere in this notice.

### 14.2 Strictly necessary technologies

Technologies required for account authentication, security, fraud prevention, load balancing, consent storage, checkout continuity and core website operation may be used without optional consent where the law permits. Blocking them may prevent login, checkout, account management or other requested functions.

### 14.3 Website analytics

At the effective date, the Framer website may use Framer's privacy-focused, cookie-free analytics to provide aggregate visit information without persistent identifiers. Optrace does not use behavioural advertising cookies. If non-essential cookies or comparable tracking are added later, Optrace will provide the choices required by law before they are used.

### 14.4 Choices

Browser settings may remove website storage, although this can sign the user out. Where a future technology requires consent, the website will provide a way to accept or reject it and later change that choice.

### 14.5 Third-party pages

Stripe Checkout, the Stripe billing portal and other linked third-party services may set their own necessary or optional technologies under their own notices and controls. Optrace should not describe an unknown third-party technology as necessary without verifying its purpose.

## 15. Changes to this notice

We may update this notice to reflect legal, product, provider or data-use changes. The current version and effective date will be published on [optrace.pro](https://optrace.pro). We will give an appropriate notice of a material change and request consent where a new use legally requires it. Earlier versions should be retained internally so that historical acceptance and disclosures can be demonstrated.

## 16. Contact

Privacy enquiries and rights requests: [privacy@optrace.pro](mailto:privacy@optrace.pro)

Account, subscription and technical support: [support@optrace.pro](mailto:support@optrace.pro)

Legal notices: [legal@optrace.pro](mailto:legal@optrace.pro)

Postal address: Optrace Technologies Ltd, Kinlochard, The Purlieu, Malvern, United Kingdom, WR14 4DJ.

## Cookie and storage categories

| Category    | Purpose                                                                                 | Typical providers                              | Consent position                                      |
|-------------|-----------------------------------------------------------------------------------------|------------------------------------------------|-------------------------------------------------------|
| Necessary   | Authentication, account security, consent choice, load balancing and requested checkout | Optrace, Framer, Supabase, Stripe              | Used where necessary; no optional advertising purpose |
| Preferences | Remember non-essential interface or website choices                                     | Optrace or Framer                              | Consent where legally required                        |
| Analytics   | Aggregate, privacy-focused website visit measurement                                    | Framer                                         | Cookie-free at the effective date                     |
| Marketing   | Advertising attribution or behavioural marketing                                        | None intended at launch unless expressly added | Disabled unless separately and validly consented      |