

Data Protection and Privacy Policy

Compent ApS
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DK
Company registration number: 29818819
(the "**Organization**")

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1. **Introduction**

- 1.1 This Data Protection and Privacy Policy (the **"Policy"**) describes how Compent ApS (**"us"**, **"we"** or **"our"**) when acting in the role of a controller, collects and processes your personal data relating to the purchase of services, membership, products, or your use of our website,
- 1.2 The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the **"GDPR"**) and the rules included herein on information to be provided to you.

2. **Types of personal data processed**

- 2.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data:
 - a) telephone number
 - b) email
 - c) name
- 2.2 In addition hereto and depending on whether you work with one of our customers and how you use our services, we may process copies of information on communication with you and other CRM data relating to your organization's commercial relationship with us.
- 2.3 When relevant, personal data is collected directly from you or from external sources. Persona data from external sources is collected from publicly available registers under the Danish Business Authority and service providers with APIs for public registers. The personal data collected via such external sources is limited to what is already publicly available.
- 2.4 If we need to collect more personal data than specified above, we will inform you by updating this Policy.

3. **Purposes of processing the personal data**

- 3.1 We will only process your personal data if we have a legitimate purpose and in that case in accordance with the rules of the GDPR. The personal data we collect about you is processed for the following purposes:
 - a) To deliver products or services.
 - b) To provide service messages and information.
 - c) To store personal data to comply with applicable legislation requirements such as bookkeeping acts.
 - d) To provide support and service messages, including responding to questions and complaints and sending updates about our products and services.
 - e) To prevent fraudulent behavior or misuse of our products, services and website,

- including the processing of personal data for the purpose of legal actions.
- f) To facilitate a sales process.
- g) To improve our products, services, or website.

4. **Legal basis for processing personal data**

- 4.1 We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:
- a) The processing is necessary for the performance of a contract to which the data subject is a party in accordance with GDPR, Article 6(1)(b), the first indent.
 - b) The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract in accordance with GDPR, Article 6(1)(b), last indent.
 - c) The processing is necessary to comply with applicable legislation in accordance with GDPR, Article 6(1)(c).
 - d) The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data in accordance with GDPR, Article 6(1)(f).

5. **Disclosure and transfer of personal data**

- 5.1 We only transfer personal data to other entities when it is legally permitted or required.
- 5.2 We transfer personal data to the following recipients from the EU/EEA:
- a) Processors
 - b) Collaborators
 - c) Suppliers
- 5.3 From time to time we use external companies as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed on the basis of a data processor agreement in accordance with the requirements hereto under GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' own data privacy policy and legal basis which the external parties are obligated to inform about unless the applicable legislation allows otherwise.
- 5.4 We do not transfer personal data to countries or international organisations outside the EU/EEA unless it is necessary on your specific request.

6. **Erasure and retention of personal data**

- 6.1 In general, we strive to always ensure that personal data is deleted as soon as it is no longer necessary for the processing purposes described above. Personal data collected and kept to comply with the Danish Bookkeeping Act is kept for 5 years after the accounting year in which the data was collected. Personal data about commercial customers is kept for as long as the customer relationship is active and the data is relevant to operate the customer relationship and ensure contractual performance of our obligations. If you are not part of an organization that is customer with us, personal data about you processed in our CRM system (where you may be saved as a "contact" if you have engaged in our marketing offerings) are erased after 12 months of inactivity. If you have any questions about our retention of personal data, please contact us via the e-mail address mentioned in the last section of this Policy.

7. **Data subject rights**

- 7.1 As a data subject under GDPR, you have a number of rights.
- 7.1.1 You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.
 - 7.1.2 You have the right to have incorrect information rectified.
 - 7.1.3 You have the right to have certain personal data deleted.
 - 7.1.4 You may have the right to restriction of our processing of your personal data.
 - 7.1.5 You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation. Objection can also be to the processing of personal data for the purpose of direct marketing.
 - 7.1.6 You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision (1) is necessary for entering into, or performance of a contract between you and the Organization, (2) is authorised by law, or (3) is based on your explicit consent.
 - 7.1.7 If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal.
 - 7.1.8 You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
 - 7.1.9 You can always lodge a complaint with the data protection authority.
- 7.2 Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.

- 7.3 More information about data subject rights can be found in the guidelines of the national data protection authorities.
- 7.4 Please use the contact details below if you want to use your rights.
- 7.5 We try to meet your wishes about our processing of personal data, but you can always file a complaint to the data protection authorities.

8. **Changes to this Policy**

- 8.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. If we make significant changes, we will provide notification by way of a visible notice, for example on our website or by direct message.

9. **Contact**

- 9.1 You may contact us at the below specified email if you:

- a) disagree with our processing or consider our processing of your personal data infringes on the law,

- b) have questions or comments to this Policy, or

- c) want to invoke one or more of your rights as a data subject described in this Policy.

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at Jeppe Basse, CEO
Mobile: +45 2125 9534
E-mail: jba@compent.net.