

Cookie- & Privacy Policy for Introdus Onboarding ApS

Effective date: 15th September 2023

Introduction

When you visit our website, information about you is collected, which is used to customize and improve our content and to increase the value of the ads displayed on the page. If you do not want information to be collected, you should delete your cookies (see instructions) and refrain from further use of the website. Below, we have explained what information is collected, their purposes, and which third parties have access to them.

Data Controller

We are the data controller for the processing of personal data that we process about our customers and partners. You can find our contact information at the end of this policy.

It is not a requirement for our company to have an <u>external Data Protection Officer (DPO)</u>, but if you have questions about the processing of your personal data, you can contact us via hello@introdusapp.com.

Cookies

The website uses "cookies," which are text files stored on your computer, mobile, or similar device for the purpose of recognizing it, remembering settings, performing statistics, and targeting ads. Cookies cannot contain harmful code such as viruses.

It is possible to delete or block cookies. See instructions: http://minecookies.org/cookiehandtering

If you delete or block cookies, ads may become less relevant to you and appear more frequently. You may also risk that the website does not function optimally and that there is content you cannot access.

Personal Information

General

Personal information is any kind of information that can be attributed to you to some extent. When you use our website, we collect and process various types of such information. This happens, for example, when accessing content, signing up for our newsletter, participating in contests or surveys, registering as a user or subscriber, using other services, or making purchases via the website.

We typically collect and process the following types of information: a unique ID and technical information about your computer, tablet, or mobile phone, your IP address, geographical location, and which pages you click on (interests). To the extent that you give explicit



consent and enter the information yourself, we also process: name, phone number, email, address, and payment information. This typically occurs when creating a login or making a purchase.

Security

We process your personal information securely and confidentially in accordance with applicable law, including the General Data Protection Regulation and data protection laws. Your information will only be used for the purpose for which it was collected and will be deleted when this purpose is fulfilled or no longer relevant. We have taken technical and organizational measures to prevent your information from being accidentally or unlawfully deleted, disclosed, lost, impaired, or coming to the knowledge of unauthorized persons, abused, or otherwise processed in violation of the law.

We ensure the secure processing of personal data by implementing appropriate technical and organizational measures.

We have conducted risk assessments of our processing of personal data and have subsequently implemented appropriate technical and organizational measures to enhance data processing security.

One of our most important measures is to keep our employees updated on GDPR through ongoing awareness training, GDPR courses, and by reviewing our GDPR procedures with employees.

Purpose

The information is used to identify you as a user and show you ads that are most likely to be relevant to you, to record your purchases and payments, and to be able to provide the services you have requested, such as sending a newsletter. In addition, we use the information to optimize our services and content.

Storage Period

The information is stored for the period allowed by law, and we delete it when it is no longer needed. The period depends on the nature of the information and the background for storage. It is therefore not possible to specify a general timeframe for when information is deleted.

Disclosure of Information

Data about your use of the website, the ads you receive and possibly click on, geographical location, gender, and age segment, among others, are disclosed to third parties to the extent that this information is known. You can see which third parties are involved in the "Cookies" section above. The information is used for advertising targeting.

Furthermore, we use a number of third parties for storage and processing of data. These only process information on our behalf and may not use it for their own purposes. Read more on these below.

Disclosure of personal information such as name and email, etc., will only happen if you give your explicit consent. We only use data processors in the EU or in countries that can provide your information with adequate protection.



Profiling and Automated Decisions

We do not engage in profiling or automated decisions.

Insight and Complaints

You have the right to be informed about what personal information we process about you in a common format (data portability). You can also object at any time to the use of information. You can also withdraw your consent to the processing of information about you. If the information processed about you is incorrect, you have the right to have it corrected or deleted. Inquiries can be made to: hello@introdusapp.com. If you wish to complain about our processing of your personal information, you also have the option to contact the Danish Data Protection Agency.

If you no longer wish for us to process your personal information or to restrict the processing of your personal information, you can also send us a request to the email address mentioned above.

Rights of Data Subjects

According to the General Data Protection Regulation, you have several rights regarding our processing of information about you.

If you wish to exercise your rights, please contact us so that we can assist you with this.

Right to Access (Right to Information)

You have the right to access the information we process about you, as well as several additional details.

Right to Rectification (Correction)

You have the right to have incorrect information about yourself corrected.

Right to Erasure

In certain cases, you have the right to have information about you deleted before the normal general deletion time.

Right to Restriction of Processing

In certain cases, you have the right to have the processing of your personal data restricted. If you have the right to restrict processing, we may only process the information – except for storage – with your consent or for the purpose of establishing, asserting, or defending legal claims or to protect a person or important public interests.

Right to Object

In certain cases, you have the right to object to our otherwise legal processing of your personal data. You can also object to the processing of your information for direct marketing.

Right to Data Portability



In certain cases, you have the right to receive your personal data in a structured, commonly used, and machine-readable format and to have this personal data transferred from one data controller to another without hindrance.

You can read more about your rights in the Danish Data Protection Agency's guide on data subjects' rights, which you can find at www.datatilsynet.dk.

Illegal Instructions

In the context of data subject rights, it's important to note that there are certain limitations imposed by law. We are committed to protecting your data within the boundaries set by applicable regulations. In this regard, we want to make you aware of the concept of "illegal instructions."

Illegal instructions refer to requests made by data subjects that are in violation of data protection laws or regulations. These instructions may include, but are not limited to, requests to move personal data to a third country without a lawful basis or requests that contravene other provisions of the General Data Protection Regulation (GDPR) or relevant data protection legislation.

While we are dedicated to fulfilling your data subject rights, we cannot comply with requests that are deemed illegal under the GDPR or other applicable data protection laws. If you make a request that falls into this category, we will inform you of the legal constraints preventing us from carrying out the requested action.

Withdrawal of Consent

When our processing of your personal data is based on your consent, you have the right to withdraw your consent.

Complaint to the Danish Data Protection Agency

You have the right to file a complaint with the Danish Data Protection Agency if you are dissatisfied with the way we process your personal data. You can find the Danish Data Protection Agency's contact information at www.datatilsynet.dk.

We generally encourage you to read more about GDPR so that you are updated on the rules.

Publisher

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