

# Privacy Policy

Here we maintain a list of all privacy policies we've had through time.

Effective date: 11 April 2018

introduus app ("us", "we", "our" or "the Company") operates the software as a service (SaaS) website <https://introduusapp.com>, which provides a number of services including but not limited to timelines, modules, surveys, media and other functionalities relating to Preboarding, Onboarding, and Offboarding as developed and introduced by us from time to time (the "Service").

This Privacy Policy informs you as a Client of our policies regarding the collection, use, and disclosure of personal data when you use our Service and the choices you have associated with that data.

The Company and the Client are together referred to as the Parties.

We use your data to provide and improve the Service. By using the Service, you agree to the collection and use of information in accordance with this Privacy Policy. Unless otherwise defined in this Privacy Policy, the terms used in this Privacy Policy have the same meanings as in our [Terms & Conditions](#).

## Definitions

### Applicable Law

Applicable Law means the relevant laws to which the Parties are subject, including the Danish Data Protection Act and the General Data Protection Regulation 2016/679.

### Client

The Client is an entity using the Service provided by introduus app.

## **Cookies**

A cookie is a small file which asks permission to be placed on a User's device, such as the computer's hard drive. Once you agree, the file is added, and the cookie helps analyse web traffic or lets you know when you visit a site.

We use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website and services in order to tailor it to Client needs. We only use this information for statistical analysis purposes, and then the data is removed from the system.

Cookies help us provide you with better website content and functionality, by enabling us to monitor which pages you find useful and which you do not. A cookie does not give us access to your computer or any information about you, other than the data you choose to share with us.

## **Personal Data**

Personal Data means any information relating to an identified or identifiable natural person (Data Subject) who can be identified directly or indirectly, in particular by reference identifier such as name, identification number, location data, online identifier, or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person, as identified under the General Data Protection Regulation 2016/679 and any equivalent definition in the Applicable Law.

## **Data Controller**

Data Controller means a person who (either alone or jointly or in common with other persons) determines the purposes for which and the manner in which any Personal Data are, or are to be, processed.

The Data Controller shall be responsible to the outside world (including the Data Subject) for ensuring that the processing of Personal Data takes place within the framework of Applicable Law.

The Data Controller shall therefore have both the right and obligation to make decisions about the purposes and means of the processing of Personal Data. For the purpose of this Privacy Policy, you as Client are Data Controller of your data.

## **Data Processor**

Data Processor means any person (other than an employee of the Data Controller) who processes data on behalf of the Data Controller.

The Data Processor shall solely be permitted to process Personal Data on documented instructions from the Data Controller unless processing is required under EU or Member State law to which the Data Processor is subject. For the purpose of this Privacy Policy, we are the Data Processor of your data.

We may use the services of various Sub-Processors in order to process your data more effectively.

## **Data Subject**

Data Subject is any living individual who is the subject of Personal Data.

## **Sub-Processor**

Sub-Processor means any third-party company and/or individual who facilitate and process part of our Service on our behalf. Sub-Processors engaged by us at any time are listed and made available at <https://introdusapp.com/sub-processors/>

## **Usage Data**

Usage Data is data collected automatically either generated by the use of the Service or from the Service infrastructure itself (for example, the duration of a page visit).

## **User**

The User is the individual using our Service. The User corresponds to the Data Subject, who is the subject of Personal Data.

## **Information Collection And Use**

We collect several different types of information for various purposes to provide and improve our Service to you.

## **Types of Data Collected**

### **Personal Data**

While using our Service, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally, identifiable information may include, but is not limited to:

- Name
- Address, City, Postcode and Country
- Email address
- Mobile phone number
- LinkedIn profile including name, photo, headline and current position
- Cookies and Usage Data

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. You may opt out of receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

### **Usage Data**

We may also collect information on how the Service is accessed and used ("Usage Data"). Usage Data may include information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Service that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

### **Location Data**

We may use and store information about your location if you give us permission to do so ("Location Data"). We use this data to provide features of our Service, to improve and customize our Service.

You can enable or disable location services when you use our Service at any time, through your device settings.

### **Tracking & Cookies Data**

We use Cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You can instruct your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if you do not accept Cookies, you may not be able to use some portions of our Service.

Examples of Cookies we use:

- Session Cookies. We use Session Cookies to operate our Service.
- Preference Cookies. We use Preference Cookies to remember your preferences and various settings.
- Security Cookies. We use Security Cookies for security purposes.

## **Use of Data**

We use the collected data for various purposes to:

- Provide and maintain our Service
- Notify you about changes to our Service
- Allow you to participate in interactive features of our Service when you choose to do so
- Provide Client support
- Gather analysis or valuable information so that we can improve our Service
- Monitor the usage of our Service
- Detect, prevent and address technical issues
- Provide you with news, special offers, and general information about other goods, services, and events that we offer that are similar to those that you have already purchased or enquired about unless you have opted not to receive such information.

## **Retention of Data**

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with Applicable Laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of our Service, or we are legally obligated to retain this data for longer time periods.

## **Transfer of Data**

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from your jurisdiction.

If you are located outside Denmark and choose to provide information to us, please note that we transfer the data, including Personal Data, to Denmark and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to that transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and no transfer of your Personal Data will take place to an organization or a country unless there are adequate controls in place including the security of your data and other personal information.

## **Disclosure of Data**

### **Business Transaction**

If we are involved in a merger, acquisition or asset sale, your Personal Data may be transferred. We will provide notice before your Personal Data is transferred and becomes subject to a different privacy policy.

### **Disclosure for Law Enforcement**

Under certain circumstances, we may be required to disclose your Personal Data if required to do so by Applicable Law or in response to valid requests by public authorities (e.g. a court or a government agency).

### **Legal Requirements**

We may disclose your Personal Data in the good faith belief that such action is necessary to:

- Comply with legal obligations
- Protect and defend the rights or property of introDus ApS
- Prevent or investigate possible wrongdoing in connection with the Service
- Protect the personal safety of users of the Service or the public
- Protect against legal liability

## **Security of Data**

The security of your data is important to us but it should be noted that no method of transmission over the Internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Data, we cannot guarantee its absolute security.

## **"Do Not Track" Signals**

We do not support Do Not Track ("DNT"). Do Not Track is a preference you can set in your web browser to inform websites that you do not want to be tracked.

You can enable or disable Do Not Track by visiting the Preferences or Settings page of your web browser.

## **Your Rights**

We aim to take reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

Whenever made possible, you can update your Personal Data directly within your account settings section. If you are unable to change your Personal Data, please contact us to make the required changes.

If you wish to be informed what Personal Data we hold about you and if you want it to be removed from our systems, please contact us.

You have the right to:

- Access and receive a copy of the Personal Data we hold about you
- Rectify any Personal Data held about you that is inaccurate
- Request the deletion of Personal Data held about you
- Request data portability for the information you provide to us

You can request to obtain a copy of your Personal Data in a commonly used electronic format so that you can manage and move it. Please note that we may ask you to verify your identity before responding to such requests.

# Data Processing Agreement & SubProcessors

## Data Processing Agreement

Our Clients will receive a Data Processing Agreement to be read and signed. The Agreement contains rights and obligations of both Parties for when we process personal information on behalf of the Data Controller. This Agreement is based on the standard published by Danish Authorities (Datatilsynet) which has been designed to ensure the Parties' compliance with Article 28, sub-section 3 of Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC (General Data Protection Regulation), which sets out specific requirements for the content of data processing agreements including:

- that we shall solely be permitted to process Personal Data on documented instructions from the Data Controller unless the processing is required under EU or Member State law to which we are subject.
- that we shall ensure that persons authorized to process Personal Data on behalf of the Data Controller have undertaken to observe confidentiality, or is subject to a suitable statutory obligation of confidentiality.
- that we shall take all the measures required pursuant to Article 32 of the General Data Protection Regulation
- that we shall meet the requirements of the General Data Protection Regulation in order to engage Sub-Processors.
- that we shall assist the Data Controller with appropriate technical and organisational measures, in the fulfillment of the Data Controller's obligation.
- that we shall be under obligation, at the Data Controller's discretion, to erase or return all the personal data to the Data Controller.
- that we are able to show documentation to the Data Controller.

## Sub-Processors

We may employ Sub-Processors to provide part of the Service on our behalf, to perform Service-related services, or to assist us in analyzing how our Service is used.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

## **Analytics**

We may use Sub-Processors to monitor and analyze the use of our Service.

We use Google Analytics, which is a web analytics service offered by Google that tracks and reports website traffic. Google uses the data collected to track and monitor the use of our Service. This data is shared with other Google services. Google may use the collected data to contextualize and personalize the ads of its own advertising network.

You can opt-out of having made your activity on the Service available to Google Analytics by installing the Google Analytics opt-out browser add-on. The add-on prevents Google Analytics JavaScript (ga.js, analytics.js, and dc.js) from sharing information with Google Analytics about visits activity.

## **Payments**

We may provide paid products and/or services within the Service. In that case, we use Sub-Processors for payment processing.

We will not store or collect your payment card details. That information is provided directly to our SubProcessors whose use of your personal information is governed by their privacy policy.

Such Sub-Processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express, and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

## **Links to Other Sites**

Our Service may contain links to sites that are not operated by us but by our Sub-Processors. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the privacy policy of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies, or practices of any third-party sites or services, subject to the Data Processing Agreement.

## **Children's Privacy**

Our Service does not address anyone under the age of 13 ("Children").

We do not knowingly collect personally identifiable information from anyone under the age of 13. If you are a parent or guardian and you are aware that your Children have provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

## **Changes To This Privacy Policy**

We may update our Privacy Policy from time to time. We will notify you of any changes by posting the new Privacy Policy on this page.

We will let you know via email and/or a prominent notice on our Service, prior to the change becoming effective and update the "effective date" at the top of this Privacy Policy.

You are advised to review this Privacy Policy periodically for any changes. Changes to this Privacy Policy are effective when they are posted on this page.

## **Contact Us**

If you have any questions about this Privacy Policy, please contact us:

By email: [hello@introdusapp.com](mailto:hello@introdusapp.com)