

Plecto Privacy Policy

Last updated: 21st April 2020

Data Responsibility

We take the protection of your data seriously. We process personal information and have therefore adopted this Privacy Policy which tells you how we process your personal information. When you visit our websites, you agree to the contents of this Privacy Policy as well as other documents mentioned in the policy. This privacy policy defines how we process all personally identifiable information collected. In order to protect your personal information in the best possible way, we continuously assess the risk of our data processing adversely affecting your fundamental rights. We are especially aware of the risk of you being subjected to discrimination or ID theft, or suffering financial loss, loss of reputation or data confidentiality.

Contact Information

Plecto is a data controller and we ensure that your personal information is processed in accordance with the law.

Contact Information

Contact person: Kristian Øllegaard
Address: Viby Ringvej 11, 8260 Viby J
CVR no.: 34737460
Phone number: +45 7199 7160
Mail: support@plecto.com
Website: www.plecto.com

We ensure fair and transparent data processing

When we ask you to make your personal information available to us, we inform you of what data we process about you and for what purpose. You will receive this information at the time of collection of your personal data. If we collect data about you from others, e.g. a supplier, authority or partner, we will inform you of this within 10 days after we have obtained your personal information. We also disclose the purpose of the collection and the legal basis that allows us to obtain your personal information.

Processing of personal data

We store the following types of data about you

We use data about you to improve our service and ensure quality in our products and services as well as in our contact with you.

The data we use includes:

- General personal information

In some cases, we need to match your data with data we receive from other players, e.g. from social media. If the compilation can reveal your identity and information of a private or sensitive nature, we obtain your consent to the processing.

Before compiling any data, we assess whether there is a risk that the treatment will have a negative effect on your privacy. If so, we will inform you of the treatment and its purpose and ask for your consent to continue treatment.

The legal basis for processing your information

The processing of personal data is based on consent with Plecto. This is in accordance with GDPR Article 6.1.a where Plecto is Data Processor. If you sign up, and use our system, this is done on the basis of maintenance of a contract according to Article 6.1.b with Plecto.

Automatically collected data

Our digital solutions are based on different technologies to ensure usability and security. These technologies can automatically collect data to provide the best possible solution, either directly from us or from a third party on our behalf. Cookies and analysis of click stream data are examples of this, see below.

Use of cookies

Cookies, purpose and relevance

If we place cookies, you will be informed about the use and purpose of collecting data via cookies.

We obtain your consent

Before we place cookies on your equipment, we ask for your consent. However, necessary cookies to ensure functionality and settings can be used without your consent.

You can find more information on our website about our use of cookies and how to delete or reject them. If you wish to revoke your consent, please refer to the instructions under our cookie policy.

Click flow data

Every visit to a digital solution means that information is sent from your browser to a server. It is through analysis of this data that we optimize the digital solutions. Data is collected via third parties on our behalf.

Data about your computer can be collected for system administration and internal marketing related analysis. This data is statistical information about user behaviour in the digital solutions.

Examples of data collected and analysed:

- Date and time of visit
- The pages visited in the solution
- The IP address of the visitor
- Information about the browser and computer used
- URL

Information you actively provide

In addition to the information that is automatically collected, we also process data that users have actively provided to us. Examples of data that users actively provide are:

- E-mail, phone number, address, etc.

There may also be information that you share with us via social media, when participating in a competition, or in connection with registration to receive our newsletters. Also, this may be information that is available to us in connection with inquiries to e.g. customer service.

We collect and store your personal information for specific purposes

We collect and store your data for certain purposes or other legitimate business purposes. It happens when we, for example, need (non-exhaustive list):

- Adapting content in digital solutions
- Execution of orders in online store e.g. basket function, payment etc.
- Opportunity to participate digitally in customer surveys, competitions, draws, etc.
- Archive of registered products and associated personal information
- Membership management
- Order processing and communication related to your order or other queries
- Confirmation of your identity in communication with us
- We can target offers and campaigns to each customer based on behavioural history and demographic data combined with third-party solutions and data.

We only process relevant personal information

We will only process data about you that is relevant and adequate in relation to the purposes defined above. The purpose is crucial to what type of data about you is relevant to us. The

same applies to the extent of the personal data we use. We use e.g. no more data than the ones we need for the specific purpose.

Before processing your personal data, we will investigate whether it is possible for us to minimize the amount of data about you. We also investigate whether some of the data types we use can be used in anonymized or pseudonymized form. We may do so if it does not adversely affect our obligations or the service or service we offer you.

We check and update your personal information

We verify that the personal information we process about you is not inaccurate or misleading. We also make sure to update your personal information on an ongoing basis.

As our service depends on your data being accurate and up-to-date, we ask that you provide us with relevant changes to your data. You can use the contact information above to notify us of your changes.

We delete your personal information when it is no longer needed

We delete your personal information when it is no longer needed for the purpose that was the reason for our collection, processing and storage of your data. The period depends on the nature of the information and the background of the storage.

We will not disclose your personal information without your consent

If we disclose your personal information to partners and actors, including for marketing purposes, we obtain your consent and inform you of what your data will be used for. You can object to this type of disclosure at any time, and you can also opt out of marketing inquiries in the CPR register.

We will not obtain your consent if we are legally required to disclose your personal information, e.g. as part of reporting to an authority.

We always obtain your consent before disclosing your personal information to third-country partners. If we disclose your personal data to third-party partners, we are confident that their level of personal data protection complies with the requirements we have set out in this policy under applicable law. We ask requirements for the processing of data, for the security of information and for the fulfilment of the rights you have in relation to e.g. to oppose your profiling and file a complaint with the Data Protection Authorities. See instructions in the bottom of this policy.

Transfer to third countries

We do not transfer data to third countries without your consent, or without legal grounds. Our system and website is hosted in the EU. Cookies and Social Medias can be hosted both in the USA and EU. If a transfer is sending data to USA, the companies, we are partnering with are under the obligations of the EU-U.S. Privacy Shield; Swiss-U.S. Privacy Shield.

These companies are:

- Facebook
- Amazon
- LinkedIn
- Hotjar
- Hubspot
- Google
- New Relic

Security

We protect your personal information and have internal information security rules

We have adopted internal information security rules that contain instructions and measures to protect your personal information from being destroyed, lost or altered, from unauthorized disclosure, and from unauthorized access or access to it.

We have established procedures for granting access rights to those of our employees who process sensitive personal information and data that disclose information about personal interests and habits. We control their actual access through logging and supervision. To avoid data loss, we continually backup our data sets. We also protect the confidentiality and authenticity of your data through encryption.

In the event of a security breach that results in a high risk of you being discriminated against, ID theft, financial loss, reputation loss or other significant disadvantage, we will notify you of the breach as soon as possible.

Your rights

You have the right to access your personal information

You have the right at any time to know what data we process about you, where they originate and what we use them for. You can also find out how long we keep your personal data and who receives data about you to the extent that we pass on data in Denmark and abroad.

If you request, we can inform you of the data we process about you. However, access may be restricted for the privacy of other persons, for trade secrets and intellectual property rights.

You may exercise your rights by contacting us. Our contact information can be found at the top of this policy.

You have the right to have inaccurate or deleted personal information

If you believe that the personal information we process about you is inaccurate, you have the right to have it corrected. Please contact us and inform us of the inaccuracies and how to correct them.

In some cases, we will have an obligation to delete your personal information. This applies, for example, if you withdraw your consent. If you believe that your data is no longer necessary for the purpose for which we obtained it, you may request that it be deleted. You may also contact us if you believe that your personal information is being processed in violation of the law or other legal obligations.

When you make a request to have your personal data corrected or deleted, we will investigate whether the conditions are met and, if so, make changes or deletions as soon as possible.

You have the right to object to our processing of your personal data

You have the right to object to our processing of your personal data. You may also object to our disclosure of your data for marketing purposes. You can use the contact information at the top to file an objection. If your objection is justified, we will stop processing your personal information.

You have the right to receive the personal information you have provided to us and those we have obtained about you from other players based on your consent. If we process data about you as part of a contract to which you are a party, you may also receive your data. You also have the right to transfer this personal information to another service provider.

If you wish to exercise your right to data portability, you will receive your personal information from us in a commonly used format.

If you wish to access your data, have it corrected or deleted, or object to our data processing, we will investigate if possible and respond to your inquiry as soon as possible and no later than one month after we receive it.

When you visit us on Social Media

Purpose

We and the Social Media collect and process personal information when you visit the company's SoMe pages. The purpose of the treatment is to be able to market ourselves to potential customers, maintain inquiries and similar related purposes.

The actual SoMe pages managed by Plecto:

- LinkedIn: <https://www.linkedin.com/company/plecto>
- Facebook: <https://www.facebook.com/plecto>

- Twitter: <https://twitter.com/getplecto>
- Instagram: <https://www.instagram.com/getplecto/>

We follow the Data Protection Authority's current guidelines on shared data responsibility and strive to ensure that visitors to our SoMe site receive information about personal data. As mentioned below in this policy, visitors to our SoMe pages also have the opportunity to exercise their rights such as the right of access, the right to object and the right to delete.

The legal basis for our processing of personal data

The processing of personal data is based on legitimate interest based on a balance of interests. Information is not processed where consent is required.

Categories of personal data and their source

Contact information is typically collected in the form of name. If we receive sensitive information / specific categories of information, they will be deleted as soon as they become aware of it.

Recipients of personal data

The personal information provided will not be disclosed outside the company.

Storage of personal data

Since the personal information provided on the SoMe pages is provided by the person themselves on our publicly available page, the information will basically remain on the page for as long as it exists. As the provider of the information, you can always object to the balancing of interest, in order to have any notice deleted.

Automatic decisions and profiling

We assume that Social Media makes automatic decisions and profiling on the part of the personal data for which they are responsible. We do not use automatic decisions and profiling.

Policy update

We try at all times to comply with applicable legislation including privacy and data protection principles. Thus, we regularly update this policy when e.g. are changes in legislation. Significant changes will be announced through our website.

Complaints

You can always complain about our processing of your data. However, we and the Danish Data Protection Authorities (Datatilsynet), prefer that you contact us first. The Danish Data Protection Authorities address is: Datatilsynet, Carl Jacobsens Vej 53, 2500 Valby, Tel: 3319 3200, dt@datatilsynet.dk.