



**Dato:** April 21, 2020

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## **Rightly – General Privacy Policy**

### COLLECTION OF PERSONAL DATA

RightlyIP ApS, Skanderborgvej 238, 2. Floor, 8260 Viby J, Denmark ("Rightly") is a registered Danish company under vat no. 40322604. This policy sets out how we collect and process your personal data through use of Rightly's website, products and services.

We treat information of employees, customers, stakeholders and other interested parties with the utmost care and confidentiality. With this policy, we ensure that we gather, store and handle data fairly, transparently and with respect towards individual rights. We take privacy and security concerns seriously. At the same time, we would like to give you the best possible experience when visiting our websites using our products and services and therefore it is necessary to collect your personal data.

We collect and processes personal data in accordance with applicable data protection laws. We rely on our contractual arrangements with you as the lawful basis on which we collect and process your personal data when you make an order for products and services.

### WHAT PERSONAL DATA DO WE COLLECT?

When using Rightly's product or services, we collect the following personal data:

- Identity data (full name)
- Contact data (e-mail address)
- Technical data (digital footprints, internet protocol (IP), browser type and version, login data, and other technology on the device used to access Rightly)

- Usage data (including information about how you use our websites, products and services)

For certain services, such as our payment services, we require your debit or credit card information. We typically do not store this information and when we do, we maintain the data in encrypted form on secure servers.

#### HOW AND WHEN DO WE COLLECT YOUR PERSONAL DATA?

Data will be collected:

- 1) prior to, at commencement, and during the term of a contractual relationship when you request our products and services
- 2) when you complete forms for our products and services, including registering to use Rightly
- 3) when you contact us or report a problem to us, or provide feedback to us
- 4) when you transact with us through email or phone

Simply visiting Rightly's website does not require you to reveal personal data although some cookies recording session data will be collected (see our Cookie Policy). If however you ask us for information, register with us, sign up to use any of our products or services or report a problem, we collect any personal data you submit to us.

#### WHAT DOES RIGHTLY USE THE DATA FOR?

Rightly collects the personal data to be used for the following purposes:

- 1) executing quotes.
- 2) for signing you up for requested features etc.
- 3) to communicate with you regarding our products and services.
- 4) to send marketing material and other information regarding our products and activities.

#### OUR HANDLING OF STORED DATA

We have implemented various strategies, controls, policies and measures to keep your data secure and keep these measures under close review. We protect your data by using encryption techniques and we use other safeguards such as firewalls and password protection.

This means that your data is protected and only accessible by co-workers who need it to carry out their job responsibilities. We will ensure that our co-workers are trained in data protection legislation and have given appropriate confidentiality undertakings before processing your data.

Your personal data will be deleted when it is no longer relevant for the initial purpose for which it was collected, processed and saved.

#### SHARING OF PERSONAL DATA

We do not sell, publish or in any other way forward your personal data to others, unless:

- It is necessary in order to deliver our product or service to you.
- It is necessary in order to comply with legislation.
- You have given us your consent to do so.
- It is part of a collaboration with data processors, both in and outside of EU/EØS.

We will ensure that the obligations in this Privacy Policy are reflected in our agreements with those to whom we pass your personal data. We will also ensure that if we transfer your personal data outside the EEA, we have appropriate safeguards in place in accordance with data protection legislation.

#### HOW DO WE STORE YOUR DATA?

Our company securely stores your data at the following locations through our data processors:

- o Hetzner Online GmbH
  - Data Center Park Nuremberg, Germany
  - Data Center Park Falkenstein, Germany
  - Data Center Park Helsinki, Finland
- o Microsoft Azure
  - West Europe Server placed in the Netherlands
- o Auth0
  - Server placed in Frankfurt

We will only retain your personal data for as long as is necessary for the purposes described in this Privacy Policy and/or our contractual agreement.

#### YOUR DATA PROTECTION RIGHTS?

Our company would like to make sure that you are fully aware of all your data protection rights.

Every user of Rightly is entitled to the following:

- 1) The right to access data – you have the right to request our company for copies of your personal data.
- 2) The right to rectification – you have the right to request that our company correct any information you believe is inaccurate.
- 3) The right to erasure – you have the right to request that our company erase your personal data, under certain conditions.
- 4) The right to restrict processing – you have the right to request that our company restrict the processing, under certain conditions.
- 5) The right to object to processing – you have the right to object to our company's processing, under certain conditions.
- 6) The right to data portability – you have the right to request that our company transfer the data we have collected to another organization, or directly to you, under certain conditions

We will co-operate with reasonable requests for information as to our compliance with data protection legislation, and we will also assist users in the relevant reporting requirements.

#### HOW TO CONTACT US?

If you like to get in contact with us or exercise one of your rights, please contact us at our email [info@rightlyip.com](mailto:info@rightlyip.com).

#### HOW TO CONTACT THE APPROPRIATE ATHORITIES?

Should you wish to report a complaint or if you feel our company has not addressed your concern in a satisfactory manner, you may contact the Danish Data Protection Agency. Please find contact information on the following website: [www.datatilsynet.dk](http://www.datatilsynet.dk).

#### CHANGES TO THIS POLICY

We may update this Privacy policy from time to time. If we make significant changes, we will let you know but please regularly check this policy to ensure you are aware of the most updated version.

This Privacy policy was last updated on April 21, 2020.

## **Cookie Policy**

### **WHAT ARE COOKIES?**

Cookies are text files placed on your computer to collect standard internet log information and visitor behavior information. You are totally free to decline the use of cookies.

Most web browsers permit you to delete or block cookies and to warn you and ask for your consent before cookies are stored. You can find help in your browser on how to set your browser to handle and possibly block cookies. If you do not wish to use cookies when visiting our website this may affect your experience on our website.

### **WHY DO WE USE COOKIES?**

Our company uses cookies to improve your experience on our website. The cookies help make our website usable by enabling basic functions like page navigation and access to secure areas of the website. The website cannot function properly without these cookies.

### **WHAT TYPES OF COOKIES DO WE USE?**

We use functionality cookies which are essential for you to be able to experience the full functionality of our site. Furthermore, we use cookies for web statistics. We use services from Google (Google Analytics) to collect web statistics. Cookies from this provider allow us to see which pages are visited, where the traffic comes from, etc. We use the information to measure and improve the user experience on our website.