PRIVACY POLICY



Privacy Policy

At Komplio ApS we are committed to keeping your personal data safe. In this Privacy Policy you can read what personal data we collect, how we use it and who we share it with.

Summary

- We only collect personal data provided directly by you, by our Customer to us or public information;
- We will not collect any special categories of data;
- We do not transfer your personal data to third countries;
- We will disclose your personal data to third parties to a limited extend only; and
- We only use strictly necessary cookies on our website.

1. Data controller

We are a data controller in relation to personal data that we receive directly from you and when handling personal data about our Customer's Users in our Assisted Compliance Platform, Komplio, according to a SaaS Agreement with our Customer.

2. What personal data do we collect

We collect personal data provided directly by you or by our Customer, such as:

- <u>Contact information</u> postal address, name, e-mails, phone number;
- <u>Recruitment process</u> Job application, CV, exam papers, blank criminal record;
- <u>Website</u> we only use strictly necessary cookies;
- <u>Compliance services</u> identity, contact and professional information on employees of our Customers or potential Customers;
- <u>KOMPLIO</u> name, working e-mail, job title, IP-address of the Customers Users (e.g. employees, Board members, consultants); and
- <u>Accounting system</u> name, working e-mail of employees responsible for accounting/billing/payment.

We can collect personal data provided collected via public sources, such as:

- <u>E-mail signature/Business Card</u> name, working e-mail, company, job title; and
- <u>Webpages, Virk.dk</u> name, working e-mail, company, job title.

We will not collect any special categories of data. We advise you not to distribute this information to us.

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In addition, we register and process company data, which is not covered by the General Data Protection Regulation (GDPR).

3. How we may use your data and the lawful basis for doing so

We collect personal data to provide our services, to fulfil regulatory and contractual obligations, recruit new employees and service our Customers and their employees. The legal basis for doing so is GDPR Article 6(1) (a), (b) and (f).

4. Third country transfers

We do not transfer your personal data to third countries.

5. Who we may disclose your personal data to

We will only disclose your personal data to third parties where this is part of our billing process or delivering our Assisted Compliance Platform, KOMPLIO, to our Customer. Such third party could be an accounting IT-system, IT sub-contractor or IT company delivering applications and devices.

6. How we protect your data

We have high standards when it comes to IT-security and protecting your personal data. Our internal policies and procedures help ensure that we have technical and organisational security measures in place to protect against unauthorised and unlawful processing. Personal data can only be processed on a need-to-know basis.

7. Your privacy rights

You have a right to receive information about the personal data we have registered and processed about you. You have the right to have inaccurate information rectified or request the personal data to be deleted.

8. Cookies

Komplio only use strictly necessary cookies on our website and Komplio's Assisted Compliance Platform, which does not require your consent. You can find our Cookies Policy on our website.

9. How long do we process your data

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We will only register and process your personal data as long as needed to fulfil the purposes mentioned above. We can keep your personal data for a longer time if required by regulation or if the data is anonymised.

Accounting information will be kept for 5 years.

10. Contact

If you have any questions concerning our Privacy Policy, please contact us at:

Komplio ApS, Tagensvej 94, 1. Tv, 2200 Copenhagen, CVR-no. 41593261, <u>gbk@kompl.io</u>.

11. Complaint

If you disagree with the way, we treat your personal data you are welcome to contact us. You can also file a complaint to the Danish Data Protection Agency:

Datatilsynet, Carl Jacobsens Vej 35, 2500 Valby, <u>www.datatilsynet.dk</u>

12. Updates

This Privacy Policy may be updated from time to time. You can always find the most resent version on our website.