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## 1. ABOUT THIS NOTICE

- 1.1 This Global Website Privacy Notice (“**Notice**”) explains how we (as defined below) collect, share and use any information that, alone or in combination with other information, relates to you (“**Personal Data**”) when you (“**you**” and “**your**”) use our website <https://www.datarespons.com/> (the “**Website**”). This Notice also sets out the rights that you have in relation to the Personal Data that we process about you and how you can exercise them.
- 1.2 If you are a customer, a supplier or a business partner and you have provided your Personal Data to us, please review the relevant privacy notice [here](#).
- 1.3 For the purposes of this Notice, Data Respons, with registered office at Sandviksveien 26, B-1050 Brussels, registered under number 0538.473.031 (hereinafter referred to as “**Data Respons**” or “**us**”) together with its affiliates, acts as the data controller for the Personal Data that it collects via the Website. Data Respons is committed to protecting the Personal Data of the visitors of its Website. Data Respons has, therefore, implemented a global data protection program to establish and maintain high standards for collecting, using, disclosing, storing, securing, accessing, transferring, or otherwise processing Personal Data in compliance with the applicable legislation with respect to Personal Data protection, and in particular with the General Data Protection Regulation N° 2016/679 of 27 April 2016 (hereafter referred to as “**GDPR**”). This is why Data Respons has developed this Notice, which describes the standards that Data Respons applies to protect personal Data.
- 1.4 Please take the time to read this Notice carefully. If you have any questions or comments, please contact us via email at [data-protection@datarespons.com](mailto:data-protection@datarespons.com).

## 2. WHAT PERSONAL DATA DOES DATA RESPONS COLLECT AND WHY?

Personal data we process may be provided by you directly or is automatically transmitted by your web browser or terminal device when you use the website. The types of Personal Data that we may collect about you, and the reasons why we process it, are explained in the following table:

PURPOSE OF THE PROCESSING	PERSONAL DATA WE COLLECT	LEGAL GROUNDS FOR PROCESSING
To respond to your queries about sales or purchase when you contact us through our Website	First name; Last name; Employer's name; Position; Email address; Country; The industry in which you work; Your query.	- Necessity for taking steps prior to entering into a contract with a potential customer, supplier or business partner (Article 6, Section 1, lit. b GDPR)
To respond to your queries about corporate or media affairs	First name; Last name; Employer's name; Position; Email address; Country; The industry in which you work; Your query.	- Data Respons' legitimate interest to manage relationships with the media and potential investors (Article 6, Section 1, lit. f GDPR)
For online and offline marketing and communications (including to organize special promotions)	Name; Surname; Email address.	- Your consent specifically when we send you marketing messages by electronic means (Article 6, Section 1, lit. a GDPR)
Website analytics	IP address; Online identifier; Device type; Browser type; Browser version; Browsing data on the Website.	- Data Respons' legitimate interests to understand how the Website is being used and to customise and measure the audience on the Website (Article 6, Section 1, lit. f GDPR)
To improve our Website, its quality and its functionalities	IP address; Online identifier; Device type; Browser type; Browser version; Browsing data on the Website.	- Data Respons' legitimate interests to maintain and improve the Website (Article 6, Section 1, lit. f GDPR)
To enable you to quickly access our pages on social media platforms through social plugins	IP address; Online identifier; Device type; Browser type; Browser version; Browsing data on the Website.	- Data Respons' legitimate interest to increase its visibility on social media platforms (Article 6, Section 1, lit. f GDPR)

embedded on our website (LinkedIn, Twitter, Meta and YouTube) and which collect and transmit Data to such social media platforms		
To improve our Website, its quality and its functionalities	IP address; Online identifier; Device type; Browser type; Browser version.	- Data Respons' legitimate interests to maintain and improve the Website (Article 6, Section 1, lit. f GDPR)
To ensure the security of our website	IP address; Online identifier and login; Device type; timestamp.	- Data Respons' legitimate interests to secure our information (Article 6, Section 1, lit. f GDPR)

- 2.1 We may also collect certain information automatically from your device. Specifically, the information we collect automatically may include information like your login, username, IP address, device type, unique device identification numbers, broad GPS geographic location (e.g. country or city-level location) and other technical information such as browser type, version and time. We may also collect information about how your device has interacted with our Website, including the pages accessed and links clicked.
- 2.2 Collecting this information enables us to better understand the visitors who come to our Website, where they come from, and what content on our Website is of interest to them. We use this information for our internal analytics purposes and to improve the quality and relevance of our Website to our visitors. Lastly, we also use this information to improve our website and its functionalities.

Some of this information may be collected using cookies and similar tracking technology, as explained further in our Cookie Notice which is available [here](#).

- 2.3 From time to time, we may receive Personal Data about you from third party sources, but only where we have checked that these third parties either have your consent or are otherwise legally permitted or required to disclose your Personal Data to us.
- 2.4 Based on the applicable, relevant laws of the respective country, your data may be used by Data Respons for direct marketing purposes. This includes invitations to trade fairs, the sending of flyers and newsletters and customer satisfaction surveys. In addition to the regular print medium, e-mail is also used for this purpose.

### 3. PROCESSING PERSONAL DATA OF BUSINESS PARTNERS

PURPOSE OF THE PROCESSING	PERSONAL DATA WE COLLECT	LEGAL GROUNDS FOR PROCESSING
<p>To communicate with business partners within the scope of the respective business relationships or to respond to inquiries.</p> <p>For marketing and communication purposes within the scope of customer surveys, product presentations, events and campaigns, competitions and market analyses, customer satisfaction surveys and direct marketing.</p> <p>To support the settlement of legal disputes, the enforcement of existing contracts or the assertion, exercise and defence of legal claims</p>	<p>Contact information:</p> <p>Name</p> <p>Address</p> <p>Phone number</p> <p>Fax number</p> <p>Email address</p>	<p>- Data Respons' legitimate interest to manage relationships with its business partners (Article 6, Section 1, lit. f GDPR)</p>
<p>To fulfil pre-contractual and contractual obligations. This includes the processing of orders and payments, project-relevant topics and accounting obligations and specifications.</p> <p>To comply with legal requirements in all areas of law, such as tax and commercial law requirements, labour law requirements, regulations in the area of hiring out employees or white-collar crime.</p>	<p>Payment data:</p> <p>bank information</p> <p>account information</p> <p>credit card verification numbers</p> <p>relevant data to payment transactions.</p>	<p>- Data Respons' legitimate interest to manage relationships with the business partners (Article 6, Section 1, lit. f GDPR)</p> <p>Data Respons duty to fulfil legal requirements (Article 6, Section 1, lit. c GDPR)</p>
<p>To comply with security-relevant measures and specifications, e.g. of our services and on our websites. In addition, to detect criminal offences or compliance-relevant processes and to comply with existing internal security guidelines.</p> <p>To comply with legal requirements in all areas of law, such as tax and commercial law requirements, labour law requirements, regulations in the area of hiring out employees or white-collar crime.</p>	<p>Project-related/enquiry related information:</p> <p>Information required within the framework of projects or other information and data voluntarily provided by business partners as well as data made available for the Data Respons Group within the framework of an inquiry and necessary for answering it.</p>	<p>- Data Respons' legitimate interest to manage relationships with the business partners (Article 6, Section 1, lit. f GDPR)</p> <p>Data Respons duty to fulfil legal requirements (Article 6, Section 1, lit. c GDPR)</p>

Management of business relations and accomplishment of contact data bases	Personal data from publicly available sources: This includes data that is collected by credit agencies or other information services or that the Data Respons Group receives via information databases.	- Data Respons' legitimate interest to manage relationships with the business partners (Article 6, Section 1, lit. f GDPR)
To comply with security-relevant measures and specifications, e.g. of our services and on our websites. In addition, to detect criminal offences or compliance-relevant processes and to comply with existing internal security guidelines.	where legally required in the context of compliance screenings: date of birth ID card ID card numbers information on relevant court proceedings and other legal disputes involving business partners.	- Data Respons' legitimate interest to manage relationships with the business partners (Article 6, Section 1, lit. f GDPR) Data Respons duty to fulfil legal requirements (Article 6, Section 1, lit. c GDPR)

## 4. WHO DOES DATA RESPONS SHARE YOUR PERSONAL DATA WITH?

- 4.1 We may disclose your Personal Data to the following categories of recipients:
- a. to our **Group affiliated companies** for purposes consistent with this Notice. We take precautions to allow access to Personal Data only to those staff members who have a legitimate business need for access and with a contractual prohibition of using the Personal Data for any other purpose;
  - b. to our **third-party vendors, services providers and partners** who provide data processing services to us, or who otherwise process Personal Data for purposes that are described in this Notice or notified to you when we collect your Personal Data. This may include disclosures to third party vendors and other service providers we use in connection with the services they provide to us, including to support us in areas such as IT platform management or support services, infrastructure and application services, marketing, data analytics and social media platforms. Specifically, these social media platforms are LinkedIn, Twitter and YouTube which embed social plugins on our Website to provide a quick and direct access to visitors to our pages on social media platforms;
  - c. to any **competent law enforcement body, regulatory, government agency, court or other third party** where we believe disclosure is necessary (i) as a matter of applicable law or regulation, (ii) to exercise, establish or defend our legal rights, or (iii) to protect your vital interests or those of any other person;
  - d. to our **auditors, advisors, legal representatives and similar agents** in connection with the advisory services they provide to us for legitimate business purposes and under contractual prohibition of using the Personal Data for any other purpose;

- e. to a **potential buyer** (and its agents and advisers) in connection with any proposed purchase, merger or acquisition of any part of our business, provided that we inform the buyer it must use your Personal Data only for the purposes disclosed in this Notice;
- f. to **any other person** if you have provided your prior consent to the disclosure.

## **5. HOW WE PROTECT YOUR PRIVACY**

DATA RESPON uses appropriate technical and organizational measures to protect your Personal Data in the best possible way against manipulation, loss, destruction and disclosure to third parties. These measures are regularly monitored and improved in line with technical progress.

## **6. DATA STORAGE, RETENTION AND DELETION**

- 6.1 The Personal Data we collect from you is stored in our servers located in Europe and the U.S.
- 6.2 We retain Personal Data we collect from you where we have an ongoing legitimate business need to do so (for example, to provide you with a service you have requested or to comply with applicable legal requirements).
  - 6.2.1 Should you give your consent to the processing of your Personal Data, the data will be deleted accordingly after the expiry of the period specified in the consent.
  - 6.2.2 If you have revoked your consent and there are no other legal reasons for storing individual Personal Data beyond this, your data will no longer be stored.
  - 6.2.3 In order to comply with commercial and tax law retention and documentation periods, individual Personal Data maybe retained for up to 10 years.
  - 6.2.4 Should other relevant special legal regulations require longer storage, the corresponding archiving period will be applied.
- 6.3 When we have no ongoing legitimate business need to process your Personal Data, we will either delete or anonymise it or, if this is not possible (for example, because your Personal Data has been stored in backup archives), then we will securely store your Personal Data and isolate it from any further processing until deletion is possible.

## **7. INTERNATIONAL TRANSFERS OF DATA**

- 7.1 Your Personal Data may be transferred to, and processed in, countries other than the country in which you are resident. These countries may have data protection laws that are different to the laws of your country.

- 7.2 Specifically, our website servers are located in France and Netherlands, and our third-party service providers and partners operate in France. This means that when we collect your Personal Data, we may process it in any of these countries.
- 7.3 If we do, we secure that appropriate safeguards are in place, which provide adequate levels of protection of your Personal Data as required by applicable data protection laws. Such safeguards are based on standard contractual clauses approved by the European Commission or, if applicable, on an adequacy decision by the European Commission.
- 7.4 We may also transfer your Personal Data outside the EEA to countries where DATA RESPONS affiliated companies operate. To that end, we have adopted an Intragroup Data Transfer Agreement to provide an adequate level of protection of your Personal Data.

## **8. PROFILING**

- 8.1 In some instances, we may use your Personal Data in order to better understand your preferences and to provide customized products or services to you. However, we do not make any decisions based solely on automated processing of such data, which either produce legal effects that concern you or similarly significantly affect you.
- 8.2 Automated decisions mean that a decision concerning you is made automatically based on a computer determination (using software algorithms), without our human review.
- 8.3 If you are to be subjected to automated decision making, we will make it clear at the time and you have the right not to be subject to such decision or to contest the decision, to express your point of view, and to require a human review of the decision. You can exercise this right by contacting us via email at [dataprotection@datarespons.com](mailto:dataprotection@datarespons.com)

## **9. MINORS**

- 9.1 The services we provide on this Website are not intended for individuals below the age of 16. If you are under 16, please do not use or register on this Website.

## **10. DATA CORRECTNESS**

In most cases, we collect your data directly from you. Accordingly, you are jointly responsible for updating your data. We therefore ask you to notify us of any changes to your Personal Data.

Where we collect your Personal Data from third parties, you will be informed separately.

## **11. YOUR RIGHTS IN CONNECTION WITH PERSONAL DATA AND HOW YOU CAN EXERCISE THEM**

In accordance with applicable regulations, you have the following rights:

- To access: you can obtain information relating to the processing of your Personal Data and request a copy of such Personal Data.
- To rectify: where you consider that your Personal Data are inaccurate or incomplete, you can require that such Personal Data be modified accordingly.
- To erase: you can require the deletion of your Personal Data, where legally applicable.
- To restrict: you can request the restriction of the processing of your Personal Data, where legally applicable.
- To object: you can object to the processing of your Personal Data, on grounds relating to your situation, where legally applicable.
- To withdraw: if Personal Data is processed based on consent given by you, you have the right to withdraw your consent at any time with future effect without having to justify.
- To data portability: where legally applicable, you have the right to have the Personal Data you have provided to us be returned to you or, where technically feasible, transferred to a third party.
- To opt out: you can exercise this right by clicking on the “unsubscribe” or “opt-out” link in the marketing e-mails we send you.

Please note that you may have additional rights that are provided under national laws. If you wish to exercise any of the rights above, please send an email to [dataprotection@datarespons.com](mailto:dataprotection@datarespons.com).

If you are not satisfied with Data Respons’ response, you have the right to make a complaint to the data protection authority in the jurisdiction where you live or work, or in the place where you think an issue in relation to your data has arisen. The contact details of each Data Protection Authority can be found at the following website: [https://edpb.europa.eu/about-edpb/board/members\\_en](https://edpb.europa.eu/about-edpb/board/members_en).

## **12. LINKING TO OTHER WEBSITES**

12.1 The services we provide on this Website are not intended for individuals below the age

of 16. If you are under 16, please do not use or register on this Website.

- 12.2 Our Website may contain hyperlinks to websites owned and operated by third parties. These websites have their own privacy policies and we urge you to review them. They will govern the use of Personal Data you submit whilst visiting these websites.

We do not accept any responsibility or liability for the privacy practices of such third-party websites and your use of such websites is at your own risk.

### **13. UPDATES TO THIS NOTICE**

- 13.1 We may update this Notice from time to time in response to changing legal, technical or business developments. When we update our Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Notice changes if and where this is required by applicable data protection laws.
- 13.2 You can see when this Notice was last updated by checking the “last updated” date displayed at the top of this Notice.

### **14. HOW TO CONTACT US**

It is Data Respons’ concern to provide you with the best possible support for all concerns relating to data protection.

If you have any questions about how we process your Personal Data, please feel free to contact us by sending an email to [data-protection@datarespons.com](mailto:data-protection@datarespons.com).