External Privacy Policy (External Use for Customers or Users)

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FDE A/S ("the Organization")
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1. Introduction

This Data Protection and Privacy Policy (the “**Policy**”) describes how FDE A/S (“**us**”, ”**we**” or ”**our**”), when acting in the role of a controller, collects and processes your personal data relating to the purchase of services, membership, products, or your use of our website.

The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the ”**GDPR**”) and the rules included herein on information to be provided to you.

2. Collecting personal data with cookies

By visiting and using our website(s), cookies are collected and used based on your consent. Information in these cookies include ("**Cookiedata**"):

- Browser type
- IP address

Cookiedata is used for the following:

- Administration of customer relationships in general such as orders, purchase history, invoicing, etc.
- Customer support
- Improvement of the website(s) and user experience
- Prevention of fraud, scams and illegal use of our website or services

Our use of cookies for the purpose of collecting personal data is carried out in accordance with section 3 of the Executive Order (No. 1148 of 9 December 2011).

If you wish to limit or decline the cookies placed on your computer when visiting our website you can do so at any time by changing your browser settings. However, you should be aware that if you decline or reject cookies it will impact the functionality of the website which means that there are features on the website that you will not be able to see. Any browser allows for you to delete cookies collectively or individually. How this is done depends on the browser you use. Remember to delete the cookies in all browsers, if you use several different browsers.

Cookies are stored on the user's device for the following duration: Cookie Information - 1 year
Piwic Pro - 1 year
Google Fonts - permanent

3. Types of personal data processed

3.1 General personal data

We process personal data about you when this is necessary and in accordance with the applicable legislation. The following data is processed:

- Address
- Customer number
- Email
- Invoicing and bookkeeping data and documentation
- IP addresses
- Name
- Password
- Telephone number
- Username
- Payment information
- Purchasing history

3.2 Sources of the personal data

When relevant, personal data is collected directly from you or from external sources.

Personal data is collected from user profiles on different social media, and the source of the personal data varies.

If we need to collect more personal data than specified above, we will inform you by updating this Policy.

4. Purposes of processing the personal data

We will only process your personal data if we have a legitimate purpose and in that case in accordance with the rules of the GDPR. The personal data we collect about you is processed for the following purposes:

- To administrate a customer or membership club
- To communicate and exchange data with public authorities when required by law
- To deliver products or services
- To facilitate a sales process
- To improve our products, services, or website
- To perform profiling of users, customers or members to analyse and predict their preferences and/or behavior
- To prevent fraudulent behavior or misuse of our products, services and website, including the processing of personal data for the purpose of legal actions
- To provide service messages and information
- To provide support and service messages, including responding to questions and complaints and sending updates about our products and services.
- To respond to inquiries or complaints
- To send newsletters by e-mail

5. Legal basis for processing personal data

5.1 General personal data

We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- The processing is necessary for the performance of a contract to which the data subjects is party
- The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data
- The processing is necessary to comply with a legal obligation

5.2 Special processing activities

- In addition to the above, in some instances we **analyze individual customers' or users' personal preferences** and/ or behavior with the purpose of using such analyses for marketing, sales or similar commercial activities. Before we perform such processing, we will collect a consent hereto. We perform this processing activity for the following purposes: To offer relevant supplementary services we may analyze the existing customer relationship and behavior.
- In addition to the above, we collect your personal data to be used in one or more **creditworthiness assessments** concerning you or your business when this is relevant. In this connection, we only use registered and approved credit rating agencies. We perform this processing activity for the following purposes: To secure creditworthiness of customers in relation to our service offering.
- If we send you direct marketing, including by email, we will ask for your prior consent in accordance with the applicable rules such as marketing acts.

6. Disclosure and transfer of personal data

We only transfer personal data to other entities when allowed or required to do so by applicable legislation. Our organization is part of a concern or group of companies, but personal data is not shared between the group companies.

7. Erasure and retention of personal data

We ensure that the personal data is deleted when it is no longer necessary for the processing purposes described above. However, we retain your personal data to the extent that we are legally obligated, as is the case with for example accounting and bookkeeping materials and records.

If you have any questions about our retention of your personal data, you may contact us by using the email mentioned in the last section of this Policy.

8. Data subject rights

As a data subject under GDPR, you have a number of rights.

1. You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.
2. You have the right to have incorrect information rectified.
3. You have the right to have certain personal data deleted.
4. You may have the right to restriction of our processing of your personal data.
5. You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation.
6. You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision (1) is necessary for entering into, or performance of a contract between you and the Organization, (2) is authorised by law, or (3) is based on your explicit consent.
7. If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal.
8. You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
9. You can always lodge a complaint with the data protection authority.

Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.

More information about data subject rights can be found in the guidelines of the national data protection authorities.

Please use the contact details below if you want to use your rights.

We try to meet your wishes about our processing of personal data, but you can always file a complaint to the data protection authorities.

9. Changes to this Policy

We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. If we make significant changes, we will provide notification by way of a visible notice, for example on our website or by direct message.

10. Contact

You may contact us at the below specified email if you:

a) disagree with our processing or consider our processing of yourpersonal data infringes on the law,

b) have questions or comments to this Policy, or

c) want to invoke one or more of your rights as a data subject described in this Policy.

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at Niels Tästensen nat@itd.dk