

## Privacy and cookies policy

### 1. Introduction

1.1 We, uQualio ApS, are committed to safeguarding the privacy of our website members and visitors; in this policy we explain how we will treat your personal information.

1.2 By agreeing to this policy, you consent to our use of cookies, and to the processing of your personal information in accordance with the terms of this policy.

1.1 In addition to this policy, our Terms and conditions of use and possibly also Commercial terms - Additional terms of use - apply which include general rules for your use of the website, services and products. Our Terms and conditions of use can be found at <https://www.uqualio.com/assets/privacy/terms-and-conditions-of-use.pdf> and the Commercial Terms - Additional terms of use - can be found at <https://www.uqualio.com/assets/privacy/atou.pdf>.

### 2. Collecting personal information

2.1 We may collect, store, analyze and use the following kinds of personal information:

- (a) information about your computer and about your visits to and use of this website (including your IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths);
- (b) information that you provide to us when registering with our website (including your email address);
- (c) information that you provide when completing your profile on our website (including your name, profile pictures, gender, date of birth, relationship status, interests and hobbies, educational details and employment details);
- (d) information that you provide to us when using the services on our website, or that is generated in the course of the use of those services (including the timing, frequency and pattern of service use);
- (e) information that you post to our website for publication on the internet (including your user name, your profile pictures and the content of your posts);
- (f) information contained in or relating to any communication that you send to us or send through our website (including the communication content and metadata associated with the communication);
- (g) any other personal information that you choose to send to us;
- (h) information that you provide to us for the purpose of subscribing to our email notifications and/or newsletters (including your name and email address); and
- (i) your test and learning results registered on your profile.

- 2.2 As provider of the website, we are the data controller of your personal information. All enquiries to us must be made via the contact information stated under section 20.
- 2.3 Before you disclose to us the personal information of another person, you must obtain that person's consent to both the disclosure and the processing of that personal information in accordance with this policy.

### **3. Using personal information**

- 3.1 Personal information submitted to us through our website will be used for the purposes specified in this policy or on the relevant pages of the website.
- 3.2 We may use your personal information to:
  - (a) administer our website and business;
  - (b) personalize our website for you;
  - (c) enable your use of the social networking services available on our website;
  - (d) send you non-marketing commercial communications;
  - (e) send you email notifications that you have specifically requested;
  - (f) send you marketing communications relating to our business or the businesses of carefully-selected third parties which we think may be of interest to you, by post or, where you have specifically agreed to this, by email or similar technology (you can inform us at any time if you no longer require marketing communications);
  - (g) provide third parties with statistical information about our users (but those third parties will not be able to identify any individual user from that information);
  - (h) deal with enquiries and complaints made by or about you relating to our website;
  - (i) keep our website secure and prevent fraud;
  - (j) verify compliance with the terms and conditions governing the use of our website (including monitoring private messages sent through our website private messaging service);
  - (k) propose learnings and/or tests;
  - (l) show your learning and/or test results; and
  - (m) analyze and use your learning and/or test results for analytical purposes and make it available on our website, visible for other members, and the corporate account holders, who have published the actual learning campaign in our system.
- 3.3 If you submit personal information for publication on our website, we may publish and otherwise use that information in accordance with the license you grant to us.
- 3.4 Your privacy settings can be used to limit the publication of your information on our website, and can be adjusted using privacy controls on the website.

- 3.5 We will not, without your express consent, supply your personal information to any third party for the purpose of their or any other third party's direct marketing, unless actively approved by you.

## 4. Disclosing personal information

- 4.1 Disclosure of your personal information to another entity, natural person or the like ("recipient") means that the recipient of the information becomes data controller regarding their processing of your personal information. You acknowledge that we cannot be held responsible for the processing of your personal information by another data controller.
- 4.2 We may disclose your personal information, including your test and learning results, to the organization, who has submitted the specific test or the like to our website insofar as reasonably necessary for the purposes set out in this policy.
- 4.3 If you use your privacy settings to limit the publication of your information on your website, we may nevertheless disclose your personal information, including your test and learning results, to the organization, who has submitted the specific test or the like to our website, insofar as reasonably necessary for the purposes set out in this policy. We will inform you about such disclosure prior to or in connection with your use of the specific test or the like.

## 5. Use of data processors

- 5.1 We may transfer your personal information to any of our suppliers or subcontractors to undertake the operation of our website and other assistance related hereto and insofar as reasonably necessary for the purposes set out in this policy.
- 5.2 We may transfer your personal information to any member of our group of companies (this means our subsidiaries, our ultimate holding company and all its subsidiaries) insofar as reasonably necessary for the purposes set out in this policy.
- 5.3 We may transfer your personal information:
- (a) to the extent that we are required to do so by law;
  - (b) in connection with any ongoing or prospective legal proceedings;
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk);
  - (d) to the purchaser (or prospective purchaser) of any business or asset that we are (or are contemplating) selling; and
  - (e) to any person who we reasonably believe may apply to a court or other competent authority for disclosure of that personal information where, in our reasonable opinion, such court or authority would be reasonably likely to order disclosure of that personal information.

- 5.4 Except as provided in this policy, we will not transfer your personal information to third parties.

## **6. International data transfers**

- 6.1 Information that we collect may be stored and processed in and transferred between any of the countries in which we operate in order to enable us to use the information in accordance with this policy.
- 6.2 Information that we collect may be transferred to the following countries which do not have data protection laws equivalent to those in force in the European Economic Area: The United States of America. Appropriate safeguards for data transfers to these countries are guaranteed by the conclusion of the EU Commission Standard Contractual Clauses ("SCC"). A copy of the SCC's can be obtained by forwarding your request to us using the contact information stated under section 20.
- 6.3 Personal information that you publish on our website or submit for publication on our website may be available, via the internet, around the world. We cannot prevent the use or misuse of such information by others.
- 6.4 You expressly agree to the transfers of personal information described in this section 6.

## **7. Retaining personal information**

- 7.1 This section 7 sets out our data retention policies and procedure, which are designed to help ensure that we comply with our legal obligations in relation to the retention and deletion of personal information.
- 7.2 Personal information that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
- 7.3 Without prejudice to section 7.2, we will generally delete personal information when a member deletes his/her membership, cf. however section 7.4.
- 7.4 Notwithstanding the other provisions of this section 7, we will retain personal information:
- (a) to the extent that we are required to do so by law;
  - (b) if we believe that the documents may be relevant to any ongoing or prospective legal proceedings; and
  - (c) in order to establish, exercise or defend our legal rights (including providing information to others for the purposes of fraud prevention and reducing credit risk).

## **8. Security of personal information**

- 8.1 We will take reasonable technical and organizational precautions to prevent the loss, misuse or alteration of your personal information.

- 8.2 We will store all the personal information you provide on our secure (password- and firewall-protected) servers.
- 8.3 All electronic financial transactions entered into through our website will be protected by encryption technology.
- 8.4 You acknowledge that the transmission of information over the internet is inherently insecure, and we cannot guarantee the security of data sent over the internet.
- 8.5 You are responsible for keeping the password you use for accessing our website confidential; we will not ask you for your password (except when you log in to our website).

## **9. Amendments**

- 9.1 We may update this policy from time to time by publishing a new version on our website.
- 9.2 You should check this page occasionally to ensure you are happy with any changes to this policy.
- 9.3 We will notify you of changes to this policy by email or through notification on our website.

## **10. Your rights**

### **10.1 Your right of access**

- 10.1.1 You are at any time entitled to by a written request to receive information about our processing of your personal information, e.g. which information we have registered about you, the processing purpose, the categories of personal information concerned and the recipients to whom the information have been or will be disclosed.
- 10.1.2 You are entitled to receive a copy of the personal information we process about you. For delivery of more than one copy, we are entitled to charge a reasonable fee based on the administrative costs. Request to exercise this right must be sent in writing to us via the contact information stated under section 20 together with documentation that you are the person in question.

### **10.2 Your right to rectification**

- 10.2.1 You have the right to have incorrect personal information about you rectified by us without undue delay. If you become aware that there are errors in the information we have registered about you, we urge you to contact us in writing in order for us to rectify the information. See contact details under section 20.

### **10.3 Your right to deletion**

- 10.3.1 You have a right to have your personal information deleted by us without undue delay if, for instance, we no longer have a valid processing purpose or you withdraw your consent on which the processing is based etc. If we can demonstrate compelling, legitimate

reasons for continued processing which precede your interests, rights and freedoms or the processing is necessary for a legal claim to be established, exercised or defended, we are not obliged to delete your personal information.

## **10.4 Your right to restrict processing**

10.4.1 You have a right to restrict our processing of your personal information, e.g. if you contest the accuracy of your personal data.

## **10.5 Your right to data portability**

10.5.1 You have a right to receive the personal information provided to us in a structured, commonly used and machine readable format and to transfer these data to another data controller if our processing of the information, for instance, is based on your consent or the processing is carried out by automated means.

## **10.6 Your right to object**

10.6.1 You are at any time for reasons concerning your particular situation entitled to object to our processing of your personal data if the processing, for example, is based on legitimate interests or profiling.

10.6.2 If you object to the processing, we will no longer process your personal information unless we can demonstrate compelling, legitimate reasons for continued processing which precede your interests, rights and freedoms or the processing is necessary to establish, exercise or defend a legal claim.

10.6.3 You also have a right not to be the subject of a decision based exclusively on automated processing, including profiling, which has legal effect on you or similarly affects you significantly.

## **10.7 Your right to withdraw consent**

10.7.1 You are at any time entitled to withdraw your consent to our processing of your personal information. If you withdraw your consent, you must be aware that we under certain circumstances, for example where we have another legal basis for processing your information are entitled to continue processing, cf. also section 7. We will inform you in such cases.

## **10.8 Your right to complain**

10.8.1 You are at any time entitled to file a complaint to the supervisory authority about our processing of your personal information. The supervisory authority is Datatilsynet, Borgergade 28,5, 1300 Copenhagen K, e-mail: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk).

## **11. Automated decisions, including profiling**

- 11.1 Normally, we do not use your personal information with the purpose of making automated decisions. However, we may be obliged hereto according to law, in which case we will inform you about such processing and give you the opportunity to object within reasonable time.

## 12. Third party websites

- 12.1 Our website includes hyperlinks to, and details of, third party websites.
- 12.2 We have no control over, and are not responsible for, the privacy policies and practices of third parties.

## 13. About cookies

- 13.1 A cookie is a file containing an identifier (a string of letters and numbers) that is sent by a web server to a web browser and is stored by the browser. The identifier is then sent back to the server each time the browser requests a page from the server.

## 14. Our cookies

- 14.1 We do not use own cookies but only third party cookies, see section 15 and 16.

## 15. Analytics cookies

- 15.1 We use Raygun Analytics to analyze the use of our website.
- 15.2 Our analytics service provider generates statistical and other information about website use by means of cookies.
- 15.3 The analytics cookies used by our website have the following names: raygun4js-sid.
- 15.4 The information generated relating to our website is used to create reports about the use of our website.
- 15.5 Our analytics service provider's privacy policy is available at: <https://raygun.com/privacy>

## 16. Third party cookies

- 16.1 Our website allows third party social network cookies for the purpose of login authentication and sharing. Facebook, Twitter, Google+ and LinkedIn are the only ones we currently do allow or expect to allow.

## 17. Blocking cookies

- 17.1 Most browsers allow you to refuse to accept cookies
- 17.2 Blocking all cookies will have a negative impact upon the usability of many websites.
- 17.3 If you block cookies, you will not be able to use all the features on our website.

## 18. Deleting cookies

- 18.1 You can delete cookies already stored on your computer.

18.2 Deleting cookies will have a negative impact on the usability of many websites.

## 19. Hosting and data processor agreement

19.1 Our website and your personal information is stored with Amazon (AWS) in Germany.

19.2 Our hosting partner's privacy policy is available at <https://aws.amazon.com/compliance/data-privacy-faq/>

19.3 We have a signed agreement with AWS covering data processing and sub data processing.

## 20. Our details

20.1 This website is owned and operated by uQualio ApS.

20.2 We are registered in Denmark under registration number 39072858, and our registered office is at Egedalsvej 7, DK-3670 Veksoe Sjælland, Denmark.

20.3 Our principal place of business is at Egedalsvej 9, DK- 3670 Veksoe Sjælland, Denmark.

20.4 You can contact us by writing to the business address given above, or by using our website contact form.