

PROTECTORIA PRIVACY POLICY

1. ABOUT THIS DOCUMENT

This privacy policy describes the personal data that Protectoria Venture AS (“Protectoria”, “we”, “us”, “our”) collect, use, share and store related to the provision of the Protectoria services.

Contact details:

Protectoria Venture AS
Klingenberggt. 7b
Post 0161 Oslo
Norway
Phone: +47 2142 0101
Email: info@protectoria.com

2. PRINCIPLES

Protecting your privacy is a core part of Protectoria’s mission. You trust us to take care of your data, and we strive to be worthy of that trust.

We pledge to:

- Be transparent about how we collect, use and store personal data.
- Ask your permission before we share personal data with third parties, and to only share such data when it benefits you as a customer.
- Use the best available security practices and tools to protect your data.

By using the web pages, you agree to allow us to collect and process data as described below.

3. PLATFORMS COVERED

The privacy policy applies to the following:

- The websites at www.protectoria.com.
- E-mail correspondence between you and us.

4. HOW WE COLLECT YOUR DATA

We collect the data provided by you when you visit our websites, subscribe to our news feeds or letters, complete forms or contact us directly. Data is automatically collected when you use our digital channels, such as our web pages.

5. WHAT DATA WE PROCESS

We may process personal data of the following categories:

- Basic information, such as name, title and contact information that you have submitted to us.
- Information generated by using our web pages, such as page visits and downloaded files. You can read more about this under the cookies section below.
- If you consent to receive our newsletters, we process your consent data – to ensure your consent is valid.
- Any other information processed based on your consent. In such cases, you will receive specific descriptions of what information is processed and what it is used for.

Our web pages and digital channels are not meant for nor targeting children under 13 years of age. We do not deliberately process information about minors. If we, to your knowledge, are processing information about children under 13 years of age, you may contact us, and we will delete the information from our systems.

6. PURPOSE AND BASIS OF PROCESSING YOUR DATA

We process personal data through our web pages. The processing is conducted for the following purposes:

- **Providing services:** We process personal data to provide and deliver services to you. For example, we process your information in relation to identification of customers, invoicing and payments, customer service, technical support and customer complaint handling. Such processing is necessary to fulfil our agreements with you, and/or to provide services at your request.
- **Development and analysis:** We process data to improve our services and digital channels. Such processing is based on legitimate interests.
- **Sales and marketing:** We use both anonymized and personal data for marketing purposes. These activities include direct marketing, if we send you newsletters and other forms of direct marketing. We only send these if you consent or we have other legal basis.
- **Information security:** We may process personal data to ensure the security of our systems, and to detect and prevent certain types of misuse of our services. Such processing is based on legitimate interests.
- **Legal compliance:** We process personal data to meet legislative requirements, for example in relation to accounting and providing information to authorities when required by law. Such processing is based on the need of compliance with our legal obligations.
- **Collection and disputes:** If our agreement terminates, or if other bases for processing of your personal data therefore lapses and/or if a dispute has arisen between us, the following applies: We do not need to delete your data if we may need it to process it for the purpose of collection of any outstanding amount and/or for the purpose of dispute handling (see GDPR art. 17 (3) e).
- **Other purposes to which you have given consent:** We may process your personal data for any other purpose to which you have given us your consent.

7. COOKIES AND SIMILAR TECHNOLOGIES

We use "cookies" and similar technologies on our digital webpages. These may process data about:

- (1) the browser types and versions used,
- (2) the operating system used by the accessing system,
- (3) the website from which an accessing system reaches our website (so-called referrers),
- (4) the sub-websites,
- (5) the date and time of access to the Internet site,
- (6) an Internet protocol address (IP address),
- (7) the Internet service provider of the accessing system, and
- (8) any other similar data and information that may be used in the event of attacks on our information technology systems.

This information is necessary to (1) deliver the content of our website correctly, (2) optimize the content of our website, (3) ensure the long-term viability of our information technology systems and website technology, and (4) provide law enforcement authorities with the information necessary for criminal prosecution in case of a cyber-attack.

Google Analytics: We have also integrated Google Analytics on this website. Google Analytics is a web analytics service. A web analysis service collects, for example, data about the website from which a person has arrived (the so-called referrer), which sub-pages were visited, or how often and for what duration a sub-page was viewed. We use analytics to optimize the website.

Google Analytics uses cookies which usually transfer information about the use of the website by the user to a Google server in the USA and stored there. As Google is certified under the Privacy Shield Agreement it guarantees that [European data protection law](#) to be observed. As we only use Google Analytics with IP anonymisation the IP address of users is shortened by Google within member states of the European Union.

Only in exceptional cases is the full IP address transferred to a Google server in the USA and shortened there. Google does not merge the IP address transmitted by the user's browser with other data from Google. Users can prevent the storage of cookies by adjusting their browser software settings accordingly; users can also prevent the collection of data generated by the cookie and related to their use of the online offer to Google and the processing of this data by Google by installing cookie management software.

Please check for further information on data used by Google, setting and opposition possibilities on the web pages of Google '[Data usage by Google when you use websites or apps of our partners](#)', 'Use of data for advertising purposes', 'Manage information that Google uses to serve ads to you'.

Google will use this information on our behalf to evaluate the use of our online offer by users, to compile reports on the activities within this online offer and to provide us with further services associated with the use of this online offer and the use of the Internet. Pseudonymous user profiles of the users can be created from the processed data.

Based on our legitimate interests (i.e. interest in the analysis, optimisation and economic operation of our online offer within the meaning of Art. 6 para. 1 lit. f. GDPR) Google Analytics, a web analysis service of Google Inc. ("Google").

8. PROTECTING YOUR INFORMATION

We highly prioritize the protection of your personal data, and continuously work to safeguard it and other confidential information. Our security measures include physical, technical, and organizational measures, use of protective software, IT infrastructure, internal and external networks and technical facilities, as well as internal policies and access control.

Our security work is based on regular risk assessments and internal controls to ensure that sufficient security measures are imposed to prevent the unauthorized access of personal data.

9. SHARING OF DATA TO OTHERS

We may disclose personal data to:

RECIPIENT DATA	COUNTRY	LEGAL BASIS
Google Inc. (Google Analytics) 1600 Amphitheatre Pkwy Mountain View CA 94043-1351 United States https://marketingplatform.google.com/about/analytics/terms/us/	USA	EU US Privacy Shield
eTonec GmbH Kopernikusstr. 35 DE - 10243 Berlin Phone: +49 30 12089321 Email: privacy@etonec.com	Germany	Datenschutzgrundverordnung (DSGVO – GDPR)
Raidboxes GmbH Friedrich-Ebert-Straße DE – 48153 Münster Phone: +49 251 1498 2000 Email: support@raidboxes.io	Germany	Datenschutzgrundverordnung (DSGVO – GDPR)
Other parties	Based on your consent	

We may also transfer personal data in the following situations:

- In statutory cases, for instance by orders of courts of law or public authorities, according to predefined procedures.

- In case of transfer of business, for example as part of a merger, acquisition, sale of our assets or transfer of our services to another company. In this case, you will be notified by email or through our web pages about changes in ownership, use of your personal data, and the choices you may have regarding your personal data.

10. STORAGE PERIOD

We only store your personal data for as long as necessary and for the purpose the data was collected, unless a legal requirement demands a longer storage period, or if you have given us your consent to extended storage.

Your personal data will be processed for as long as you have an active relationship with us or our digital channels, or until you request us to delete the personal data in our systems. We consider a relationship with us as:

- (1) being a customer or customer contact of Protectoria;
- (2) having given consent to receive marketing material or other notifications from us;
- (3) having actively requested to be contacted by us via social media, electronic messages, electronic forms or on exhibitions, seminars, etc.;
- (4) having requested to follow us on social media, or
- (5) been active in our digital channels after giving your consent.

Your relationship to us is defined as 'active' as long as:

- activity has been recorded in our digital channels within the last 12 months,
- your contact information or user profile is needed to maintain the relationship to you or your company, or
- you have not explicitly withdrawn your consent.

Storage of anonymized information is not subject to such limitations or demands, as anonymized information is not considered personal data. We work to ensure that personal data and other customer data is always updated and correct, and that we do not store personal data that is unrelated to the stated purposes for processing of personal data.

11. YOUR RIGHTS

You have the right to access, correct and in some cases delete your personal data processed by us. You may also have the right to restrict or object to the processing, as well as the right to data portability. You can read more about the extent of your rights on the web pages of the Norwegian Data Protection Authority: www.datatilsynet.no, or on the webpages of other EEA/EU data protection authorities.

If our processing is based on your consent, you can always withdraw your consent to our processing of your personal data.

To assert your rights, please send us a request to privacy@protectoria.com. We will answer your request as soon as possible, and in all cases no later than in [30 days].

12. COMPLAINTS

If you are of the opinion that our processing of your personal data breaches the terms of this policy, or in other ways breaches the General Data Protection Regulation (GDPR), you can file a complaint to us by emailing us at privacy@protectoria.com, or directly to the Norwegian Data Protection Authority (Datatilsynet). However, please contact us first so that we can address your objections and resolve any misunderstandings.

You can find information about how to contact the Norwegian Data Protection Authority on their website: www.datatilsynet.no.

13. CHANGES

As our business and tools evolve, we may need to update this policy.

In case of major changes, we may try to contact you directly through available channels, such as e-mail or other digital notifications.