

# MONSENSEN SALES & MARKETING PRIVACY & COOKIE POLICY

## MONSENSEN ApS

Version 1.0.0, 23. May 2018



Monsenso understands that the security of your personal data is extremely important, and it is committed to respecting your privacy and safeguarding your personal data.

This Privacy and Cookie Policy sets out how Monsenso (Monsenso, we, us, our) uses your personal data and the measures it has put in place to protect your information and keep it secure.

This Privacy and Cookie Policy applies to you if you purchase goods from us, receive services from us, participate in our events or promotions or otherwise interact with us, including by using any of our websites or by interacting with us via social media. This does not include the usage of our Product, which has a separate Privacy Policy.

Please take a moment to review this policy in detail (together with our cookies policy and terms of use, and any other documents referred to in them if you are using one of our websites). If you are an existing customer of ours, further details about how we use your personal data may be set out in your contract with us. Further notices highlighting certain uses we wish to make of your personal data together with the ability to opt in or out of selected uses may also be provided when we collect personal data from you.

This Privacy and Cookie Policy explains our privacy practices and covers the following areas:

1. What personal data we collect
2. What we do with your personal data
3. How we use cookies
4. How we protect your personal data
5. Your rights and contacting us
6. Updates to this policy

## 1. WHAT PERSONAL DATA WE COLLECT

We will collect and process some or all of the following personal data about you:

**Information about you** - your name, address, email address, phone number, social media handle, gender, date of birth or photograph, or details of your employer and your position.

Your transaction details and purchase history - details of purchases and other transactions you have made, including through our websites or through other channels, including the delivery address and details of the products purchased.

**Information we collect about your participation in our promotions and competitions or attendance at our events** - information provided in your application forms, recordings you or we have made, details of your guests in connection with any promotions and competitions you have entered or won, or other information related to your attendance at events, including any dietary and access assistance requirements you may have. Information about your interests - details of any hobbies or activities you undertake per details of your personal interests.

**Marketing preference information** - details of your marketing and communication preferences and information we collect to help us determine what products and services may be of interest to you.

Survey information - your responses to market surveys that we conduct.

**Our correspondence with you** - including any feedback, complaints and comments from you via telephone, email or social media, or records of any online, paper or in-person correspondence and interactions between us. If you have communicated with us by phone, we will collect details of the phone number used to call us, and any information collected via a call recording.

**Technical information** - including the Internet protocol (IP) address used to connect your computer to the Internet, or your login information, browser type and version, time zone setting, browser plug in types and versions, operating system and platform.

**Information about your visit to our websites** - including the full Uniform Resource Locators (URL) clickstream to, through and from our websites (including date and time), products you viewed or searched for, pages you accessed, page response times, download errors, lengths of visits to certain pages, page interaction information (such as scrolling, clicks and mouse-overs), and methods used to browse away from the page.

## SOURCES OF PERSONAL DATA

We collect much of the personal data that we hold about you directly from you or your interactions with us, our websites or social media sites. We may also receive your personal data from other sources, including business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, and search information providers.

## 2. WHAT WE DO WITH YOUR PERSONAL DATA

Under European data protection laws (European Data Protection Laws) we must establish and inform you of a legal basis or “ground” for our use of your personal data. For each use mentioned below we note the purpose for which we use and disclose it, and the ground we rely on as the basis for our use. An explanation of each of the grounds can be found below.

**Consent:** where you have consented to our use of your information (you will have been presented with a consent form in relation to any such use and may withdraw your consent by the means stated in our Privacy and Cookie Policy).

**Contract performance:** where your information is necessary to enter into or perform our contract with you.

**Legal obligation:** where we need to use your information to comply with our legal obligations.

**Legitimate interests:** where we use your information to achieve a legitimate interest and our reasons for using it outweigh any prejudice to your data protection rights.

These are the principal legal bases that we typically use to justify our use of Special Categories of your Personal Data:

**Legal claims:** where your information is necessary for us to establish, defend, prosecute or make a claim against you, us or a third party.

In the substantial public interest: processing is necessary for reasons of substantial public interest, on the basis of EU or local law.

**Explicit consent:** you have given your explicit consent to the processing of the personal data for one or more specified purposes. You are free to withdraw your consent by contacting us as set out in the “Contact” section of the above notice. If you do so, we may be unable to provide our products or services that require the use of such data.

Depending on how you interact with Monsenso, we will use your personal data for the following purposes:

**To provide and manage products and services you have requested:** To carry out our obligations arising from any contracts entered into between you and us, including to arrange delivery, to action or cancel orders, to provide you with the information, products and services that you request from us, and to notify you about changes to our products and services  
*Legal bases:* contract performance, legitimate interests (to enable us to perform our obligations and provide products and services to you or to notify you about changes to our products and services)

**To communicate effectively with you:** To respond to your questions, comments, complaints or other communications, including any queries relating to our products

*Legal bases:* legitimate interests (to allow us to correspond with you and provide products and services to you), legal claims

**To monitor activities and record our correspondence with you:** To monitor our communications with you, including to ensure service quality, compliance with procedures and for training purposes  
*Legal bases:* legitimate interests (to ensure the quality of our products and services)

**To provide you with marketing materials:** To provide you with information by post, email, phone, SMS, or online or social media advertisement about products and services that we offer where such products or services are similar to those you have already purchased or enquired about, or where you have consented to being contacted for those purposes. We may also use your information for marketing selected business partners' products and services. Where required by law, we will ask for your consent at the time we collect your data to conduct any of these types of marketing. We will provide an option to unsubscribe or opt-out of further communication on any electronic marketing sent to you or you may opt out at any time by contacting us using the details set out in the "Contact" section below  
*Legal bases:* consent, legitimate interests (to keep you updated with news in relation to our products and services)

**To understand our customers, and to develop and tailor our products and services:** We may analyse the personal data that we hold in order to measure or understand the effectiveness of the advertising we serve to you and others, and to deliver relevant advertising to you. We may report aggregate information to our advertisers, and make suggestions and recommendations to you, our customers and users of our websites about products or services that may interest you or them  
*Legal bases:* legitimate interests (to ensure the quality of our products and services, allow us to improve our products and services, and provide you with the content and services on our websites)

**To run our promotions and competitions:** Where you are participating in promotions and competitions, to run such promotions and competitions, including to notify you if you have won. If you win a prize, in accordance with local law, we may make your personal data and your guests' personal data available on our websites and social media pages and in press releases. We may also make these details available to third parties who may need this information for prize fulfilment purposes  
*Legal bases:* legal obligations, contract performance, legitimate interests (in order to successfully run our promotions and events)

**To run our events:** If you attend an event organised or otherwise supported by us, we may use your personal data, including specific dietary requirements, health information and access assistance, in connection with the running of the event  
*Legal bases:* legitimate interests (to allow us to run our events, and to cater for and accommodate your specific preferences and requirements during our events), explicit consent (if required)

**To reorganise or make changes to our business:** In the event that we: (i) are subject to negotiations for the sale of our business or part thereof to a third party; (ii) are sold to a third party; or (iii) undergo a re-organisation, we may need to transfer some or all of your personal data to the relevant third party (or its advisors) as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation. We may also need to transfer your personal data to that re-organised entity or third party after the sale or reorganisation for them to use for the same purposes as set out in this Privacy and Cookie Policy  
*Legal bases:* legitimate interests (in order to allow us to change our business), legal obligation

**To comply with legal and regulatory obligations:** We may process your personal data to comply with our legal and regulatory requirements, which may include disclosing your personal data to third parties, including insurers, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings or investigations by such parties anywhere in the world or where compelled to do so  
*Legal bases:* legal obligations, legal claims, legitimate interests (to cooperate with law enforcement and regulatory authorities)

If you have any questions about the legal bases we rely on, please contact us using the details set out in the "Contact" section below.

### 3. HOW WE USE COOKIES

Cookies are small pieces of information that are stored by your browser on your computer's hard drive. They are often used as a mechanism for websites to remember useful information, such as your login details, and can contribute to ease of use when navigating a website. Our cookies cannot identify you personally.

Cookies on our website are used for a variety of different purposes, but generally speaking their use breaks down into the following categories:

- a) **Strictly Necessary Cookies:** These are required for the operation of our website. They include, for example, cookies that enable you to log into secure areas of our website.
- b) **Analytical/Performance Cookies:** These allow us to recognise and count the number of users of our website and see how such users navigate through our website. This helps to improve how our website works, for example, by ensuring that users can find what they are looking for easily.
- c) **Functionality Cookies:** These improve the functional performance of our website and make it easier for you to use. For example, such cookies are used to remember that you have previously visited the website and asked to remain logged in to it
- d) **Targeting Cookies:** These record your visit to our website, the pages you have visited and the links you have followed. We will then use this information to make advertising displayed on it more relevant to your interests.

You can manage cookies by activating the setting on your Internet browser that allows you to refuse the setting of all or some cookies.

Please note, if you do turn cookies off, this will limit the service that we are able to provide to you and may affect your user experience.

### 4. HOW WE PROTECT YOUR PERSONAL DATA

#### WHERE IS YOUR PERSONAL DATA STORED?

The data that we collect from you is stored within the European Economic Area (EEA).

#### HOW LONG IS YOUR PERSONAL DATA STORED FOR?

The personal data that we hold about you will not be kept for longer than is permitted by law and will only be kept for as long as necessary to provide you with any requested products, services or information, or for any other purpose set out under the heading "What do we do with the information" above.

For example, we may retain certain transaction details and correspondence until the time limit for claims arising from the transaction has expired, or to comply with regulatory requirements regarding the retention of such data.

#### DISCLOSURE OF YOUR INFORMATION OUTSIDE THE EEA?

Where we transfer personal data from inside the EEA (we may be required to take specific additional measures to safeguard the relevant personal data. Certain countries outside the EEA have been approved by the European Commission as providing essentially equivalent protections to EEA data protection laws and, therefore, no additional safeguards are required to export personal data to these jurisdictions. In countries that have not had these approvals, we will use appropriate safeguards to protect any personal data from being transferred, such as EU Commission-approved model contractual clauses or binding corporate rules permitted by applicable legal requirements.

Please contact us using the details set out in the "Contact" section below if you would like to see a copy of the specific safeguards applied to the export of your personal data.

## **WHAT DO WE DO TO SAFEGUARD PERSONAL DATA?**

We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy and Cookie Policy.

Where we have given you (or where you have chosen) a password that enables you to access certain parts of our websites, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your personal data transmitted to our websites - any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **WHAT ABOUT LINKS TO OTHER SITES?**

Our websites and social media pages may, from time to time, contain links to and from the websites of our partner networks, affiliates and other third parties. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **5. YOUR RIGHTS AND CONTACTING US**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you or collect your consent (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by clicking unsubscribe at the bottom of the emails we send to you for marketing purposes. You can also exercise the right at any time by contacting us at support@monsensocom.

## **UPDATING INFORMATION**

We will use reasonable endeavours to ensure that your personal data is accurate. In order to assist us with this, you should notify us of any changes to the personal data that you have provided to us by contacting us using the details set out in the "Contact" section below.

## **YOUR RIGHTS**

If you are based in the EEA during your interactions with us, under certain conditions, you may have the right to require us to:

provide you with further details on how we use and process your personal data; provide you with a copy of the personal data that we hold about you; rectify inaccuracies in the personal data and complete any incomplete personal data that we process about you; delete personal data we no longer have grounds to process; and restrict how we process your personal data whilst we consider an inquiry you have raised.

In addition, under certain conditions, you have the right to:

where processing is based on consent, withdraw the consent; ask us to transmit the personal data you have provided to us and that we still hold about you to a third party electronically; object to any processing of personal data that we process on the "legitimate interests" or "public interests" grounds, unless our reasons for the underlying processing outweigh your interests, rights and freedoms; and object to direct marketing (including any profiling for such purposes) at any time.

These rights are subject to certain exemptions to safeguard the public interest (e.g. the prevention or detection of crime) and our interests (e.g. the maintenance of legal privilege) and may not all be available in the country in which you are based.

If you have the right to do so, you can exercise these rights by contacting us using the details set out in the "Contact" section below.

If you are not satisfied with our use of your personal information or our response to any exercise of these rights, you have the right to complain to the Danish Data Protection Agency.

## **CONTACT**

Questions, comments and requests regarding this Privacy and Cookie Policy are welcomed and should be addressed to support@monsensocom.

## **6. UPDATES TO THIS POLICY**

Any changes we may make to this Privacy and Cookie Policy will be posted on the website and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to this Privacy and Cookie Policy.