

# Privacy Policy

Valid from: 07.02.2023

## 1. Introduction

Welcome to Opoura's privacy policy, where we will present you our plan of action when it comes to protecting your privacy and personal data (hereafter referred to as Personal Identifiable Information (PII)).

The purpose of this policy is to describe the way that we collect, store, use, and protect information that can be associated with you and could be used to identify you.

## 2. Applicable for

1. All visitors to our corporate website
2. All customer employees that we engage with during daily operation
3. All supplier employees that we engage with during daily operation
4. All candidates applying for a job position within Opoura
5. All other business partners or individuals representing legal or other authority, that we engage with during daily operation

## 3. Data controller

Opoura is a data controller, and we understand the importance of protecting the rights of data subjects. Any PII received or collected during daily operation is for the sole use of Opoura and will not be transferred or sold to any third party, except as required by law, legislation, or governmental audit.

When referencing Opoura, this encompasses:

- Opoura Group and the companies within the group
- Majority investor; Magnesium Capital LLP

We are a global company with a corporate IT setup that enables us to work from almost anywhere through secure and protected data connections. Our primary sites are located in Denmark, Germany, Poland, Ukraine, Romania, Spain, Portugal, the United States, and the United Kingdom.

## 4. Your rights

If you want to contact us regarding our processing of your PII, please reach out by emailing to this address: [IMS@opoura.com](mailto:IMS@opoura.com) or via phone number +45 9641 9200.

## 5. We collect & process

We collect PII concerning you and process it in accordance with current laws and legislation. The most common ways are when:

- You provided it for the purposes that you indicated, with your consent
- We collected it with a business-justifiable reason

- We collected it by searching publicly available information sites
- When processing (incl. collecting) your personal information, we disclose it, and combine it with other personal information for various purposes, including:
- Products or services purposes – such as collecting orders or requests for and providing our products or services
- Marketing purposes – such as pursuing lawful related marketing activities
- Business purposes – such as recruitment, accounting, customer and supplier relation, business planning and operation, strategy planning, or other proposed and actual transactions
- Legal purposes – such as handling claims, complying with law, legislation, and other requirements, or pursuing good governance.

We only collect, process, and store the PII necessary to fulfill our purpose. What type of PII that is required to collect and store in connection with our business practice may be determined by law. The nature and the extent of the personal data we process can be determined by the need to comply with a contract or any other legal obligation.

## 6. Consent

When you consent to receive newsletters about Opoura products, case studies, and other news, request information, apply for a job position, or for other purposes, you do so voluntarily.

For newsletters, you can unsubscribe at any time by activating the “Unsubscribe” link in any of the emails.

You can withdraw your consent by contacting [IMS@opoura.com](mailto:IMS@opoura.com) at any time.

## 7. Data transport

We use third-party IT suppliers to store and process data (outsourced processes). They only store and process data on our behalf and may not transport, sell, or use any data at/to their will and benefit. In relevant cases, data is given to, e.g., banks, transport companies, and debt collectors.

We will only pass on data such as name, email, etc., for other purposes if you (or your employer) have provided us with consent.

## 8. Data quality

Our services depend on correct and up-to-date PII. Therefore, we ask you to inform us about relevant changes to your PII.

Please contact your normal Opoura representative, use the contact form on our website, or write to [IMS@opoura.com](mailto:IMS@opoura.com).

## 9. Security

We have taken the necessary technical and organizational measures to prevent your data from being deleted, released, lost, or impaired accidentally or illegally.

Similarly, technical and organizational measures have been taken to prevent your data from becoming known to unauthorized people or in any way being processed against laws and legislation.

## 10. Recruitment

All applications and relevant appendices are stored in our HR system.

Access to CVs and application content is limited to HR and Hiring managers, with the purpose of qualifying candidates and answering applications. CVs and appendices are deleted immediately after completion of the hiring process for each individual position. CVs and appendices can be stored for up to 6 months hereafter if consent has been given by the candidate.

A “Recruitment privacy notice” is provided to candidates as part of each recruitment process to ensure that the candidates are sufficiently informed about special steps in the hiring process, like profiling, where special processing can occur.