

# Processing of personal data in Profitbase (Privacy Policy)

Profitbase processes personal information both for our own business as a data controller and for our customers as a data processor.

All our processing of personal data complies with the applicable privacy regulation at any time, including the Norwegian Personal Data Act and the General Data Protection Regulation (GDPR).

This policy describes the processing of personal data by Profitbase of persons not employed in our business which are not otherwise informed about the processing, as well as the basis for the processing and the rights of the data subjects (i.e. the persons to whom the personal data relates) upon processing of personal data.

If you have any questions about our processing of personal data, please contact us at [post@profitbase.no](mailto:post@profitbase.no).

## **1 DATA CONTROLLER. THE PERSONAL DATA BEING PROCESSED**

Profitbase processes personal data regarding people who are in contact with us, either as customers, suppliers or in other contexts to the extent that such processing is necessary for the purpose of contact with us. Below are the cases where personal data are normally dealt with, where Profitbase is the data controller for the processing of personal data (i.e. it is Profitbase that determines the purpose and the means for the processing). Where Profitbase is a data processor, i.e. processes personal data on behalf of another data controller, such as customers of Profitbase, it is the data controller that will inform the data subjects about the processing.

The data controller for the processing of personal data is Profitbase AS. Profitbase can be contacted at:

Email: [post@profitbase.no](mailto:post@profitbase.no)

Phone: +47 970 64 000

Please find additional contact information [here](#).

Information on the personal data we process, the purpose of the processing, how long we process the personal data, the basis for the processing, whether the personal data is provided and/or transferred to countries outside the EEA-area, are included below.

### **1.1 Contact persons with existing and potential corporate customers and suppliers**

Profitbase processes personal data with existing and potential corporate customers and suppliers and other partners to manage our relationships with suppliers and others, prepare, execute and document purchases and sale of goods and services as well as evaluate the purchase and sale of such goods and services.

The processing of personal data is based on our legitimate interest, which consists of the need for purchasing, sales and marketing. We also store and transfer data where we have a legal obligation to do so, for example, according to accounting and tax regulation. We store the data as long as we consider needing the data, such as to document conditions regarding buying and selling.

In many cases, it will be necessary for us to obtain personal data to enter into agreements with customers and suppliers, among other things, to document that an agreement has been entered into. If we do not get the information we need, we may not enter into an agreement.

It is voluntary for the contact persons to provide us with personal data. If we retrieve personal data from others, it will mainly apply to contact information (including name, address, telephone number and e-mail address), position, function and employer, as well as any competence and references where relevant. The source of such information will be the contact person's employer, for example, from the employer's website. In some cases, we collect references from others to assess the suitability of customers and suppliers.

Profitbase will store the information until the company ceases to be a customer/supplier or until the contact person ceases to be the contact person, with the exceptions mentioned above.

## **1.2 Contact with others**

Profitbase will process personal data about those who contact us to answer and document the communication. This applies to all forms of communication, physical and digital, written and oral.

The processing of data is based on our legitimate interest, which consists of having contact with the outside world in our business and in documenting the business we operate. The personal data is processed upon balancing of interests, and we have considered it that it is necessary for us to handle inquiries made to us. We have considered that the interests of the data subjects and fundamental rights and freedoms do not go beyond these interests.

It is voluntary to provide us with personal data, but it will be necessary to provide us with the information so that we can respond to inquiries.

We process the information until we expect that there will be no further follow-up of the contact, normally for one year.

## **1.3 Use of web-pages**

To obtain data on the use of our website, we use cookies and other technologies such as pixels. More information about which technology we use to get data is available at the bottom of this page.

Profitbase also collects data through the contact form on our website, where names, e-mails, and messages that are submitted via the form are collected. This information will be deleted as soon as we have contacted the person who has reached out to us unless

the information is processed further in connection with the reason for which he or she contacted us.

We process personal data collected on our website based on legitimate interest. We have considered it necessary for us to collect the data to adapt the website to our users. However, we safeguard the privacy of visitors to the website by using only the information for statistics. In these statistics, it is not possible to identify individuals.

We use the data collected to improve the customer experience on websites and services, as well as to provide functionality in the services. We also use the information to provide visitor recommendations and services that are most relevant to you. This will both be given based on visitor behaviour, e.g. based on services used, links that are clicked on, or information read, and based on the behaviour of other users with similar usage patterns.

The personal data is also used to improve our website and to compile statistics and understand the use of the pages. As far as practicable, we try to do this with anonymous information, without connecting the data to individual visitors.

## **2 DELIVERY AND TRANSFER OF PERSONAL DATA**

Profitbase does not pass on your data to others in other cases than mentioned below unless there is a legal basis for such extradition. Examples of such a basis will typically be an agreement with the data subject or a legal basis that obliges us to release the data.

Profitbase uses data processors to collect, store or otherwise process personal data on our behalf. In such cases, we have entered into agreements to safeguard the information security at all stages of the processing.

All processing of personal data carried out by Profitbase will take place within the EU/EEA area, but it may be that we use suppliers or process personal data outside the EU/EEA area. In such cases, transmission and processing outside the EU/EEA area will take place in countries approved by the EU Commission, in accordance with the EU-US Privacy Shield framework, the EU standard contract terms for transfer to third countries or another specific legal basis for the transfer of personal data.

Personal data may, in some cases, be handed over to a public authority. Such extradition will only take place if we are required to do so in accordance with applicable laws and regulations.

## **3 PROCESSING AND STORAGE TIME (ERASURE)**

Profitbase stores personal data as long as it is necessary for the purpose for which the personal data was collected and erases the data in accordance with the requirements of the regulations. How long we process and store the individual types of data is set forth above in Section 1 under the information on the individual processing activities.

Instead of deleting the personal data, it may be appropriate in some cases to anonymise the personal data. By anonymisation is meant that all identifying or potentially identifying features are removed from data sets that are preserved.

## **4 YOUR RIGHTS WHEN WE PROCESS YOUR PERSONAL DATA**

### **4.1 Right to access, rectification and erasure**

The data subjects that we process personal data on having the right to demand access, rectification or erasure of the personal information we process.

To apply your rights, please contact us using the contact information provided above in this statement. We will respond to your inquiry to us as soon as possible and within 30 days. If it takes more than 30 days, you will be notified.

As a data subject, you may request us to correct any data we have about you or ask us to erase your personal data. We will, as far as possible, accommodate a request for the erasure of personal data, but we cannot comply with the request if we still need the information, for example, that we must store the data for reasons of documentation related to claims or accounting.

We will, if necessary, ask you to confirm your identity or to provide additional information before allowing you to use your rights. We do this to make sure that we only give you access to your personal information – and not to someone pretending to be you.

### **4.2 Right to restriction of processing**

You also have the right to obtain restriction of processing where one of the following applies:

- a) You dispute the accuracy of the personal data, for a period enabling Profitbase to verify the accuracy of the personal data;
- b) The processing is unlawful, and you oppose the erasure of the personal data and requests the restriction of their use instead;
- c) Profitbase is no longer in need of the personal data for the purposes of the processing, but are required by you for the establishment, exercise or defence of legal claims;
- d) You have objected to processing pursuant to Article 21(1) of the GDPR pending the verification whether the legitimate grounds of the Processor's override your interests.

You can read more about these rights on the Data Inspectorate's website:

[www.datatilsynet.no](http://www.datatilsynet.no).

### **4.3 The right to data portability**

For information that you have provided to Profitbase and which is based on consent or necessary to conclude an agreement with Profitbase and which is processed automatically (ie, not manually) by Profitbase, you may request that your personal information be disclosed or transferred to another supplier in a structured, commonly used and machine-readable format (data portability).

#### **4.4 Automated decisions, including profiling**

There will be no automated decisions, as mentioned in Article 22 (1) and (4) of the GDPR based on your personal data.

#### **4.5 The right to make a complaint to a supervisory authority**

If you believe that our processing of personal data is not in accordance with what we have described here or that we in other ways violate the privacy law, you can make a complain to the Norwegian Data Inspectorate.

You can find information on how to contact the Data Inspectorate at the Data Inspectorate's website: [www.datatilsynet.no](http://www.datatilsynet.no).

### **5 CHANGES**

If there is a change in our processing of personal data or changes in the regulations regarding the processing of personal data, this may result in a change in the information provided here. If we have your contact information, we will notify you of these changes by contacting you. Otherwise, updated information will always be available on our website.

### **6 COOKIES**

On the Profitbase website, only cookies are used to register the use of the web pages and to personalize better the web pages for users to improve the user experience. A cookie is a text file that when viewed or interacted with a website is placed in your browser's internal memory.

You have the option of preventing cookies from being placed in your browser. Most modern browsers are set to accept cookies automatically, but you can choose to change the settings yourself so that the capsules are not accepted. The disadvantage of disabling cookies in your browser is that the web pages, app and web services will not work optimally. The reason is that the purpose of most of the cookies we use is to provide precisely the functionality of the services.

We also use tools other than cookies to obtain information about your IP address, the type of browser you are using, your broadband provider, operating system, date and time for site and service visits. We use this information to analyse trends so that we can make the site and services more user-friendly.

#### **6.1 What types of cookies do we use?**

Cookies on our site can be divided into four categories:

##### *6.1.1 Essential cookies*

Some cookies are crucial to the operation of our site. For example, cookies will allow us to identify users so that they can log in to their accounts. If you choose to disable cookies, you will not be able to access your account.

### *6.1.2 Performance Cookies*

We use cookies to analyse how visitors use our site and to monitor website performance. This allows us to identify any issues and quickly fix them. For example, we can use performance cookies to keep track of which pages are most popular. We can also use performance cookies to display links to other sites that we think you may be interested in based on the pages you have viewed.

### *6.1.3 Functionality Cookies*

We use functionality cookies to remember your preferences. For example, to remember any changes you have made to your preferences in your account settings. We may also use functionality cookies to provide you with other services, such as allowing you to view video clips on our site.

## **6.2 Technology used**

### *6.2.1 Google Analytics*

Google Analytics is a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies and other technologies to analyse how users use the site. The information generated by such cookies using the site in question, including your IP address, is sent to Google and stored on servers in the United States. The individual user of the web pages cannot be identified. Google uses this information to evaluate the use of the site, to compile site activity reports for the site owner, and to provide other services related to site activities and the use of the Internet.

Google may also transmit this information to third parties if required by us. Law or in cases where third parties process the information on behalf of Google. Google will not link your IP address to any other information.

### *6.2.2 Content elements from Facebook*

We use content elements from Facebook through iFrame. The cookies "Reg\_ext\_ref", "reg\_fb\_gate" and "reg\_fb\_ref" are used to track web browsers that are not logged into Facebook and provide Facebook with information about where new users come from. Cookies will be deleted when you close your browser.

"Datr" is a security-related cookie that identifies the browser independently of the user and is deleted after two years.

"Fr" and "sb" are cookies used by Facebook to provide relevant advertising and are deleted after three months and one year, respectively.

"Staticxx.facebook.com" is only used for static content.

"IDE" is used to keep track of advertising on the device where the cookie is installed.

### *6.2.3 Other technologies*

The "1P\_JAR" cookie is used to display integrated YouTube videos on the pages. The cookie only records anonymous statistics for videos such as how many times videos are displayed and what are the video playback settings.

### **6.3 Change in browser settings**

You can change your browser settings to limit which cookies can be used in your browser.

If you change the settings and block cookies, this will mean that certain features of the web page will not work, and you will not take full advantage of all the features the website can offer.