



# PRIVACY POLICY

 **APRIL 2024**



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#1 - RelationCity is the data controller

# RelationCity is the data controller

We value your privacy and take the protection of your personal information very seriously.

This Privacy Policy is applicable to RelationCity. By using our services, including our website, you agree to the contents of this Privacy Policy. If you have any questions regarding how we process your personal data, please contact our Compliance & GDPR Team.

RelationCity is the data controller of the personal data you have sent to us. You will find our contact information to the right.



## Contact information

### RelationCity ApS

Buchwaldsgade 50  
5000 Odense C

**Company registration number:** 42258148

**Phone:** +45 6611 8311

**Mail:** [info@relationcity.com](mailto:info@relationcity.com)

## #2 - Personal data

# Personal data

This Privacy Policy applies to the processing of personal data that occurs when we collect information about you and when you use our services, including our website.

Personal data is all data about a person, who can be identified directly or indirectly. Personal data includes personal and factual data regarding a particular individual. This is for example details such as name, address and telephone number. Information that cannot be linked to a specific individual - e.g. favorite web pages or number of users on one site - is not considered personal data and is therefore not a part of this Privacy Policy.

Using technical and organizational measures, we make the best efforts to protect personal data against loss or misuse.

The use of the data collected is analyzed anonymously for statistical purposes. Statistical reports used to evaluate the use of RelationCity's website and services. Especially the order in which pages are visited and the path between the pages is shown. The aim is to give RelationCity a clue about how the usability of the site can be further improved.

Every time you access RelationCity's website, it will be registered.



## RelationCity as a data controller

Information that is collected for the purpose of creating an account at our platforms is **email** and **phone number**. Furthermore, we collect **first and last name**, **company information** (**address, zip code, city, country, IP address**) and **vat number** if you start using our services.

### Categories of data subjects

Customers

Employees

Potential customers

Associates, affiliates and suppliers.

The legal basis for the processing of this personal data is in connection with being able to uncover the needs of customers using the services that we offer. The personal information can also be used for sending invoices, newsletters, reports etc. Legal basis for the processing is the General Data Protection Regulation (GDPR) Article 6 (1) (b, c and f).

#### #4 - Use of website and login

# Use of website and login

The website is divided into an open and a closed area.

The closed area is available only with an individual username and password. The closed area is the dashboard that you will enter, if you sign up as a customer.

The open area includes contact form, access to see our prices, services, some trusted customers, chat with our support team, etc. Personal data entered within the chat with our support team, such as name and email is needed to process your request.

We process the collected data by visiting our website for statistical purposes, striving to offer you quality. This can, as an example, be that we wish to optimize the use of our website. Please see our Cookie Policy for more information about the data collected through the use of cookies on our website.





## #5 - Use of cookies

# Use of cookies

Cookies are collected for marketing purposes, user login history and to remember user login and if the customer chooses the remember me function in the purchase flow and thus gives consent, as well as for general session management.

In addition with your account creation, our website uses cookies. For further information about how we use cookies and what we use them for, see our [Cookie Policy](#).



#6 - Newsletter

# Newsletter

By subscribing to the newsletter, you consent to RelationCity contacting you by mail with news or other relevant marketing material. We register name and email address when subscribing to the newsletter. Only relevant employees have access to the list of registered people.

**You can at any time unsubscribe from the newsletter in the bottom of each mail.**



## #7 - Use of personal data

# Use of personal data

In addition to customer creation and login, personal information is used for customer support and notifications regarding the user's account. We do not have access to this personal data ourselves. Instead, we use tools for profiling and linking conversions.

We also refer to our Terms & Conditions that states our efforts to mitigate fraud and other harmful or unwanted use, where we periodically and randomly perform checks on the use of our service to ensure its validity and legality, as well as following up on supplier-notified cases of the aforementioned unwanted usage.

## #8 - Sharing of personal data

# Sharing of personal data

RelationCity exchanges personal information with suppliers and affiliates to fulfill sales and delivery obligations, including providing service and support for the products our customers use at RelationCity. RelationCity will only disclose personal information if required by law or if a court order exists. In addition, we pass on personal information to the debt collection agency in case of prolonged non-payment of invoices.

Personal information is treated confidentially and is only disclosed to our supplier, partners and affiliates if it has a necessary purpose or public authorities where this is required by law.

Exports of personal data to suppliers outside of the EEA only if EU's Standard Contractual Clauses (SCC) apply and when there is an adequate level of data protection, as well as a confirmed ability of complying with the SCC and GDPR.





#9 - How long do we keep your personal information?

## How long do we keep your personal information?

If you have a user account at our services, we store your personal information in our systems for up to 18 months, after your account is frozen. We freeze your user account after 60 days of inactivity, and notify you by email.

If you don't have a user account at our services, and you only visit our website, we store personal information for up to 18 months after your visit, after which it is anonymized. Please see our Cookie Policy for more information about the data collected through the use of cookies on our website.

Personal information or any type of data under a data processing agreement, will be stored in accordance with the data processing agreement.



# Securing personal data

- We only use Tier 4 data centers located in the EU.
- Strict login procedures.
- The latest firewall programs.
- Only employees with work-related purposes have access to personal data.
- We ensure that buildings and systems used in connection with data processing are secure, and that only high-quality hardware and software is used, which is constantly updated.
- We ensure that employees receive adequate instructions and guidelines for the processing of personal data.
- We ensure that employees who are authorized to process personal data have entered into confidentiality agreements or are subject to the necessary regulatory regulated confidentiality obligation.
- Based on a continuous risk assessment of personal data breach, we introduce appropriate technical and organizational security measures to protect your personal information from unauthorized access, collection, use, disclosure, copying, modification or disposal.
- In the event that a provider of services or services is used, our IT security personnel ensure that the supplier always follows the same instructions as in the data processing agreement, and applies appropriate measures to protect the personal data that they process on our behalf.
- Strong communication security has been implemented on all our websites, such as TLS encryption 1.3, which ensures that data is encrypted, which ensures that information stays confidential when transmitted over the Internet.

# Your rights

Under the General Data Protection Regulation (GDPR), you have a number of rights in relation to our processing of information about you.

If you want to exercise your rights, you must contact us.

## **How can I see the information you have about me? (Right of access)**

You have the right to ask us for the information we have about you.

If you would like to see the information we have, please contact our Compliance and GDPR team. Please note that we may ask for identification so that your personal information is not passed on to someone else.

## **Can I have my information corrected? (Right to rectification)**

If you find that we are processing incorrect information about you, then you can ask us to correct it.

It is not always possible for us to correct all information. For example, we cannot correct the recipient's phone number if it

is wrong after we send a message, as the message has already been sent, but we can correct the number for next time you send messages.

If you would like your information corrected, please contact our compliance and GDPR team.

## **How can I delete the information about me? (Right to erasure)**

You can ask us to delete the personal information we have about you.

We may not be able to delete all the information we have about you. Sometimes we are required by law to store the information or we have a contractual obligation with you or someone else. In those situations, we will consider how we can limit the handling.

If you wish to exercise your right to object, please contact our compliance and GDPR department. Please note that we may ask for identification so that there is no doubt as to who you are.



# Your rights

## How can I stop you using my information?

If you want us to stop using your information, please contact us.

You should be aware that we might still have a valid reason to process information about you. We process all requests separately and return with a decision.

If you wish to exercise your right to object, please contact our compliance and GDPR department. Please note that we may ask for identification so that there is no doubt as to who you are.

## Right to restriction of processing

In certain cases, you have a right to have restricted the processing of your personal data. If you have a right to have the processing restricted, in the future we may only process the information - except for storage - with your consent or for the purpose of determining, relying on or defending a legal claim or to protect a person or vital public interests.

## Right to data portability

In some cases, you have the right to receive your data in a structured, commonly used and machine-readable format, and to have the data transferred from RelationCity to another data controller without hindrance.

## Can I complain about your processing of my data? (Right to object)

If you are not satisfied with the way we process your information, you have the right to complain to the Danish Data Protection Authority. You can find their contact details at [www.datatilsynet.dk](http://www.datatilsynet.dk)

## Are decisions made based solely on automatic processing?

We never make decisions based solely on automatic processing or the use of artificial intelligence.



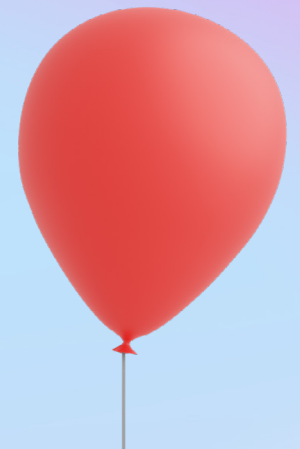
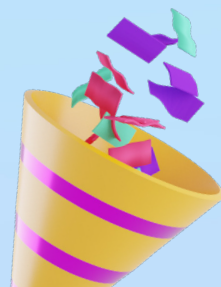
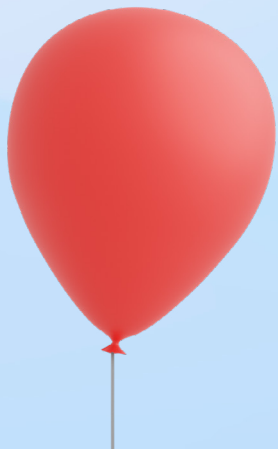
#12 - Updating this Privacy Policy

# Updating this Privacy Policy

RelationCity reserves the right to modify this privacy statement at any time.  
We will notify you of any changes to this privacy policy on our website.

You automatically accept the changes to the privacy policy - to the extent permitted by applicable law - by using our services after being notified of any such changes.

Therefore, we urge you to regularly review our privacy policy on the website for the latest information on how we protect your personal information.



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