

Privacy Statement BORG IT ApS

Last updated 11.01.2024

The BORG IT Privacy Statement helps you understand what personal data we collect and why we collect it, and how we handle, protect, store, export, and delete your personal data.

Personal data is any information relating to an identified or identifiable natural person, such as an email address, street address, phone number, etc.

What personal data do we process?

The type of personal data that BORG IT processes about you may be:

- **Basic personal information** such as name, address, telephone number, email and demographic information
- **User and web traffic information** such as login ID, username, and IP address
- **Financial information** such as invoice-related information
- **Content** you have uploaded or provided such as photos, comments, articles and videos
- **Statistics** that show how what products the users are interested in and which content they consume
- Information **provided through job applications**

For the purposes mentioned in the section “Why we process personal data”, BORG IT does not process sensitive personal data about you.

How is personal data collected?

We collect information about you when you provide it to us directly or indirectly when you browse our website or use our services.

Why do we process personal data?

This BORG IT Privacy Statement applies when BORG IT processes your personal data for various purposes when you interact with us, such as:

Buy and deliver

- Facilitate customer orders, agreements, payments
- Offer services directly to you, such as e-learning, webinars, reports, etc.
- Provide requested offers on products and services to Customers
- Create and facilitate accounts for users of our services

Support and improve

- Improve and develop the quality, functionality and user experience of our products, services and BORG IT Sites
- Offer customer support of our products and services
- Operate user communities to educate and enable interaction between users and BORG IT

Security

- Detect, mitigate and prevent security threats and abuse, and perform maintenance and debugging

Marketing

- Manage and send marketing preferences and content
- Create interest profiles in order to promote relevant products and services (profiling)

Recruiting

- To manage recruitment processes and process job applications
- Evaluate submitted documentation, conduct interviews and call references

Information regarding how personal data is processed in one of our many services is outlined in the respective data processing agreement for that service. BORG IT does in such cases act as a data processor and processes the data on behalf of and according to instructions given by the Customer. For more information regarding this, please contact customer support for that specific service.

What is the legal basis for processing your personal data?

We process data based on several legal grounds.

Agreement with you

We process your personal data on the basis of a legal binding contract with you. This will typically be when you apply for a job in BORG IT. Processing your personal data such as CV, application and references is necessary for BORG IT to handle jobseekers' requests before a contract is entered into.

Your consent

BORG IT might process your personal data based on consent. You will always be able to withdraw your consent, after you have given the consent.

Legitimate interest

BORG IT has a legitimate interest when we process your data for security, support and

improvement purposes, or when you act as customer contact/lead for our existing and potential customers, hereunder in customer support. Your personal data is processed from a business perspective in a manner that we believe does not conflict with your privacy rights or freedoms. Further BORG IT processes data based on legitimate interest if you are signing up for a webinar, downloading reports or other content from our web pages, and using our BORG IT communities. The legitimate interest is to provide you with correct content, hold webinars, do marketing and administrate your requests.

Read more about how BORG IT processes your personal data for marketing purposes based on legitimate interest and your rights when we process your personal data for such purposes under the section called “marketing” in this privacy statement.

How is your personal data shared?

Within BORG IT

It is important for us that we provide the best possible overall experience for you. In order to maintain an overview and insight, BORG IT may share your personal data within BORG IT.

Business partners

BORG IT may share your personal information with our partners in the event this is legitimate from a business perspective and according to applicable privacy legislation.

Public authorities

The police and other authorities may request access to personal information from BORG IT. In these cases, BORG IT will only provide the data if there is a court order etc. to do so.

When do we use processors?

BORG IT uses processors to process personal data. These processors are typically vendors of cloud services or other IT hosting services.

When using processors, BORG IT will enter into a data processing agreement in order to safeguard your privacy rights.

For information on sub-processors used to provide you a BORG IT service, please see our data protection policy.

How long is your data stored?

BORG IT will only store your personal information as long as required to perform our contractual obligations. When processing your personal data on other legal basis, such as legitimate interest, data is stored as long as necessary to fulfil the purpose of processing.

Hence, your personal data may be subject to different retention policies based on the type of data and the purpose of collecting it. Here are some examples:

When recruiting, BORG IT will delete your personal information such as CV, application and other documents when the recruitment process is closed, typically maximum 6 months after application deadline, unless otherwise agreed upon with you.

Another example is contact information stored for marketing purposes, including leads or prospects. Such personal data will be deleted no later than 24 months after the last registered activity.

For further information regarding deletion, feel free to contact BORG IT (see contact information in the last section of this statement).

What are your rights?

You can invoke the following rights in relation to our processing of your personal data:

- **Access.** You have the right to request a copy of personal data we process about you.
- **Rectification.** You also have the right to request BORG IT to rectify inaccurate personal data concerning you.
- **Deletion.** You can request BORG IT to delete personal data relating to you.
- **Restriction.** You may ask us to restrict the processing of your personal data
- **Portability.** You may ask us to provide you or others with your personal data in a structured, commonly used and machine-readable format.
- **Object.** On grounds relating to your particular situation, you have the right to object to our processing of your personal data on the basis of legitimate interests or for direct marketing purposes. You also have the right to object to our processing of your personal data for the performance of tasks carried out in the public interests or in the exercise of official authority or based on legitimate interests.

Please note that there may be certain exceptions or limitations to the abovementioned rights which could apply depending on the specific circumstances of your situation. In such cases, we will provide you with detailed information about the applicable exception or limitation and help you exercise your rights to the fullest extent possible, in accordance with applicable laws and regulations.

Please use borgit@borgit.com to file requests as mentioned in this section.

Finally, you also have a right to file a complaint to the data protection authorities with regards to our processing of your personal data.

Marketing and profiling

The legitimate interest

When you interact with BORG IT e.g. by visiting BORG IT web pages, downloading content, attending webinars, and as part of using BORG IT's services, BORG IT will be processing your personal data based on legitimate interest. One of BORG IT's legitimate interests is the processing of personal data for direct marketing purposes.

BORG IT uses your personal data to provide relevant content to you through direct marketing on social media platforms and emails, webpages or in a BORG IT service, based on your preferences.

The personal data processed are aggregated details about you such as IP address, interests (where you have clicked, etc.), username and device. This is done through technologies like cookies and is called profiling. BORG IT will also be able to combine this information with information about the customer relationship we may have with your company.

BORG IT uses email as a tool to communicate marketing, however only if you have consented in accordance with national marketing legislation (if needed). If you have consented, you will always have the possibility to opt out as described below, or when you receive an email containing marketing.

Right to opt-out of marketing communications

You have the right to opt out of receiving marketing communications from BORG IT and be subject to profiling. You can do this by either:

(a) Following the instructions for opt-out in the relevant marketing communication

(b) Contacting us via e-mail at borgit@borgit.com

You will also always have the option to opt into/out of cookies on a particular web page, through our cookie banner.

Please note that even if you opt out from receiving marketing communications, you may still receive administrative communications from BORG IT, such as order confirmations and notifications necessary to manage your account or the services provided to Customers.

Changes

We encourage you to review the Statement regularly. If we make significant changes to our Statement that materially alter our privacy practices, we may also notify you by other means, such as sending an email or posting a notice on our corporate website and/or social media pages prior to the changes taking effect.

The Privacy Statement is revised at least yearly.

Last updated: 11.01.2024

How to contact us

BORG IT ApS, located at Borggade 22, 6300 Gråsten, CVR DK28698623, is the company responsible for the collection, use and disclosure of your personal information in accordance with this Privacy Policy.

If you have any questions about this privacy policy, please contact us at borgit@borgit.com or

BORG IT ApS
Borggade 22
6300 Gråsten

BORG IT's Data Protection Officer (DPO) can be contacted at borgit@borgit.com for questions regarding this Privacy Policy, data collection and data processing.