



Data protection and privacy policy

Data controller:

Brightminded IVS

Forskerparken 10

5230 Odense

Company registration no.: 38 27 65 57

1. Introduction

1.1 The policy regarding the collection and processing of personal data and the use of cookies (hereinafter the “Policy”) describes how Brightminded IVS, with Danish company registration number 38 27 65 57, (hereinafter “us”, “we” or “our”) as data controller collects and processes personal data about you as a customer or customer employee, when you visit and use our online Product (hereinafter the “Product”). When you use our Product, you accept that this Policy is applicable.

2. Which personal data do we collect and for what purposes?

2.1 When you use our Product, we collect and process information about you by the use of cookies. This information include your browser type, your search terms in our Product, your IP address and information about your computer type (hereinafter “Cookie Data”). Cookie Data are generally used to improve our product, improve the conversion of users on our websites and perform targeted advertising.

2.2 When you use our Product, we will also collect and process personal data about you to be able to provide our Product to you and the customer business that you represent. These data are both collected by us and typed

in by you and comprise name, address, e-mail, telephone number, log of activity (hereinafter “General Customer Data”).

2.3 We ask you to not register and type in any sensitive personal data in our Product, including in commentary fields, support chat or similar fields made available for free text drafting. Sensitive personal data include information about race, ethnic origin, religion or philosophical beliefs, sexual orientation, health, political preferences and worker’s union membership.

3. On what legal basis do we process your personal data?

3.1 Our processing of your Cookie Data is done because it is necessary for the purposes of our legitimate interests in improving the user experience and offer our customers the best and most relevant offers and products.

3.2 Our processing of your General Customer Data is done because it is necessary to perform the contract we have with you and the customer business you represent.

4. Do we transfer your personal data to others?

4.1 We only transfer your personal data to third parties if permitted by the applicable legislation.

4.2 We use external third-party businesses as suppliers to provide the best solution to you. These external suppliers are called data processors and they will in some instances and to some extent process your personal data in connection with the external suppliers’ provision of services to us. Our data processors only process your personal data in accordance with our instructions, the applicable legislation and the data processor agreement that we have entered into with them.



5. How long do we keep and store your personal data?

5.1 We make sure that we delete your personal data on an ongoing basis when they are no longer needed or relevant to pursue the purposes they are collected for. We do, however, keep copies of your personal data to the extent this is required by the applicable legislation, for example with respect to personal data included in bookkeeping records that has be kept in copy for five years.

6. What rights do you have as a data subject?

6.1 You have a number of rights under the applicable legislation that we can help you with. Your rights include the following:

(a) You have the right to of access to the personal data processed about you along with the purposes of the processing and information on any transfer of your personal data to any third countries.

(b) You have the right of rectification of your personal data.

(c) In some instances, and under certain conditions, you have the right to have your personal data deleted before our deletion, se paragraph 5.

(d) In some instances, and under certain conditions, you have the right to restriction of processing of your personal data.

(e) You have the right of data portability of some of your personal data.

(f) Under certain circumstances, you have the right to object to our processing of your personal data.

(g) If we ever process personal data about you based on your consent to do so, you have the right to withdraw such consent at any time after which we will delete your personal data collected on the basis of your consent.

6.2 If you wish to enforce your rights and get our help in doing so, please contact us using the email listed in the end of this Policy.

6.3 We strive to do everything to meet your requests and wishes to our processing of your personal data. If you – despite our endeavors – are not satisfied with our processes and you wish to complain, you can do so at the Danish Data Protection Agency (www.datatilsynet.dk).

7. Changes to this Policy

7.1 Changes to this Policy may be necessary due to changes in the way we process personal data. If we change this Policy, we will renew the date and version below. If we make any material changes, we will communicate this via our website, e-mail or other communication means.

8. Contact

8.1 If you have questions or comments to this Policy or if you want to claim any of your rights as a data subject, you may contact us on gs@bright-minded.com.

This is version 1, updated on 1 March 2020.

Best regards

Brightminded IVS