

PRIVACY POLICY

Version 1.0: May 25, 2018

This privacy policy describes how ORBINOX (hereinafter “we, our or us”) process personal data.

We respect your privacy. Whether you are a returning customer, or just browsing our website, we want to make you comfortable with our privacy policy and the security measure that we take to protect your personal data.

For that reason, we have implemented a high standard of data protection and we have incorporated concepts from the General Data Protection Regulation (UE) 2016/679, of 27 April 2016 (GDPR). If you provide us with personal data or if we collect personal data about you from other sources, we will treat it in accordance with this policy. We encourage you to read this privacy policy in full.

GENERAL PRINCIPLES FOR PROCESSING OF PERSONAL DATA

In order to ensure that your personal data is processed correctly and with a suitable level of data protection, we have adopted the following processing principles:

- Personal data is processed lawfully, fairly and in a transparent manner
- Personal data is collected only for specified, explicit and legitimate purposes and not processed further in a manner incompatible with those purposes.
- Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Personal data shall be accurate and where necessary kept to date, and inaccurate or incomplete personal data will be rectified or erased or further processing will be suspended.
- Personal data shall not be kept in a form which permits identification of the data subjects for longer time than necessary for the purposes for which the data was collected or for which it is further processed.
- Personal data shall be processed in a manner that ensure appropriate security of the personal data

We will always inform you of the collection and processing of your personal data unless we have legitimate reason not to do so.

DATA TYPES

We will collect and process your personal data in a number of ways when you engage with us.

Some of the personal data is necessary for us to process in order to provide you with the services you have requested, and some personal data you can choose to provide voluntarily.

We primarily process data in the following instances:

- i) When you visit our websites, e.g. when browsing the website, filling in a form, responding to surveys or taking part in survey
- ii) When we process data for marketing purposes, including if you subscribe to a newsletter or when we send newsletters to our customer base

- iii) When you participate in an event, trade fair, etc.... and are in touch with us before, during or after the event, e.g. as part of queries or sales
- iv) When you are in a customer or supplier relationship with us

We process the following data types about you depending on which category you belong to, cf. the above:

Category	Personal data
Website visitors	<ul style="list-style-type: none"> • IP address and MAC address (depending on the type of device you are using) • Visitors history and visitor behavior, e.g. the pages clicked on, the length of time page is viewed, etc. • Queries sent via the website etc. and responses received by e-mail etc. • If you have submitted information using a form, including such data as name, e-mail address, country of residence, area of interest, the company or organization in which you are employed or in any other way represent.
Marketing	<ul style="list-style-type: none"> • Name, telephone number, e-mail address, postal address, job title, area of interest • Company or organization in which you are employed or in any other way represent • Information about any consents granted for marketing purposes or any opt-out provided by existing customers • Tracking the processing of electronic marketing received, e.g. whether the message was opened, how long the message was viewed, which part of the message and which links were clicked on, etc.
Events and trade fairs	<ul style="list-style-type: none"> • Name, job title, e-mail address, telephone number • Areas of interest • Company or organization in which you are employed or in any other way represent • Participation in trade fairs and events
Customers / Suppliers	<ul style="list-style-type: none"> • Name, job title, e-mail address, telephone number • Areas of interest • Company or organization in which you are employed or in any other way represent • Participation in trade fairs and events • History of interaction with us, including records of e-mail communication • Data submitted to us

As a rule, we will not process any special categories of personal data (special personal data) about you unless you have provided your explicit consent thereto or unless we are required to do so in order to comply with current legislation.

PURPOSES OF PROCESSING AND LEGAL BASIS

We only process your personal data in order to pursue a legitimate purpose and generally we will only process your personal data if one or more of the following criteria apply:

- The processing is necessary for the performance of a contract
- The processing is necessary for compliance with a legal obligation that we are subject to
- The processing is necessary for the purposes of the legitimate interest pursued by us or by a third party and such processing is not considered harmful
- You have provided your consent to such processing

As a general rule, our legal basis for processing personal data relating to contact persons with our customer/supplier base, is the balancing of the legitimate interests pursued by us in our business-to-business relationships with you against your right of protection of your personal data. We believe this is considered harmless to you as the registered party as we have only registered basic contact details about you in relation to the organisation in which you are employed, and because we are processing this data to be able to provide a service towards you and your employer.

We process your personal data for the following purposes:

- To provide you with products, services and information that you request from us
- To send you newsletters or other marketing material, including surveys
- To administer our business relations and negotiate and execute agreements
- To provide general customer service and support
- To gain customer insights and knowledge of how our various services, including websites, applications and products are used as well as for evaluation and improvement of these
- To communicate with you regarding various matters
- To comply with any current legislation

COOKIES

We may use cookies on our websites or our applications. Please read more about the use of cookies in our cookie policy, which you can find in the footer of our website.

The purposes of processing of data collected by the use of cookies, are the following:

- to operate, improve and optimise the performance and user experience of the website and its services
- to perform customer and user analysis and segmentation in order to improve our understanding of our users, and provide better and tailored services to users, including you
- statistical purposes

AUTOMATIC INDIVIDUAL DECISIONS

Your data is not being used for automated individualised decision-making.

SOURCES

Personal data is collected directly from you, which includes any queries made by you or the company you are representing by telephone, e-mail, at trade fairs, through submitted orders etc. Data is also received via our website, e.g. via cookies and forms.

WITHDRAWAL OF CONSENT

If the processing is based on consent, you have the right to withdraw your consent, but this will not affect the processing or handover of data done prior to the withdrawal of the consent.

DISCLOSURE AND TRANSFER OF PERSONAL DATA

Our disclosure and transfer of your personal data to recipients (natural or legal persons, public authorities, agencies or others, to which the personal data is disclosed) is kept to a minimum and is subject to an adequate level of data protection.

We may disclose or make personal data available to recipients under the following circumstances:

- Recipients who carry out services on our behalf, such as e.g. Hosting, Cloud computing, IT-support, marketing services, administrative services, training services or other data processing. Such recipients are only allowed to process the personal data according to our instructions and the relationship will be governed by a written data processor agreement
- In order to fulfill our obligation to supply goods to you as a customer, including providing relevant information to our sub-suppliers, including intra-group companies
- To establish, exercise or defend our legal rights
- If you have provided your prior consent to the disclosure of personal data to a recipient
- In the event of any merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our assets or stock
- As set out in our cookie-policy, cf. above

If the recipient of the personal data is located in a country outside the EU/EEA which does not ensure an adequate level of data protection, we will only transfer your personal data to such recipient following the execution of a written transfer agreement based on the EU Commissions Standard Contractual Clauses or similar approved protection regime.

STORAGE PERIOD

We do not store the personal data for longer than is legally permitted and necessary for the related processing purposes. The storage period depends on the type of personal data, the purposes and the applicable law and therefore varies

We erase personal data after the above storage period or when you request us to erase the personal data, unless there are legal or regulatory requirements which may require us to retain your personal information.

DATA SECURITY

In order to safeguard your personal data, we have implemented appropriate technical and organisational measures to ensure a level of security which matches the risks represented by the processing and the nature of the personal data to be protected, taking into consideration the state of art and the costs of implementing such measures.

Following the evaluation of the risk, we have taken measures to protect personal data against accidental or unlawful destruction or accidental loss, alteration, unauthorised disclosure or access, in particular where the processing involves the transmission of personal data over a network, and against all other unlawful forms of processing.

YOUR RIGHTS

You have the right to access to the data processed about you, subject to certain statutory exceptions. Furthermore, you can object to the collection and further processing of your personal data. In addition, you have the right to correct your personal data, if necessary. You may also choose to request us to restrict the processing.

We will delete or correct any information, which is inaccurate or out of date.

If you provide us with a written request, we will also delete your personal data without undue delay, unless we have a legal basis for continue the processing, e.g. if the processing is necessary to establish, exercise or oppose a legal claim or necessary to the performance of a contract with you or the company or organisation in which you are employed or in any other way represent.

In order to invoke any of the rights mentioned above, please contact us via the contact information provided below.

Kindly provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request as soon as possible and within one month.

If you disagree with our processing of your personal data, please be informed that you can lodge a complaint with your local data protection agency.

LINKS TO OTHER WEBSITES AND SIMILAR

Our websites may contain links to other websites or to integrated sites. We are not responsible for the contents of the websites of other companies (third-party websites) or for the practices of such companies regarding the collection of personal data. When you visit third-party websites, you should read the owners' policies on the protection of personal data and other relevant policies.

CHANGES

We may change our Privacy and Cookies Policy from time to time. The updated Privacy and Cookies Policy applies to your continued use of the website and our use of personal data. We kindly ask you to review our Privacy and Cookies Policy on a regular basis.

CONTACT

If you have any questions about the processing of your personal data or if you wish to exercise any of your rights, please contact ORBINOX at gpdr@orbinox.com