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This document informs you of Ellab A/S', including our subsidiaries' ("Ellab", "us", "we", or "our") policies regarding the collection, use, and disclosure of personal data when you use our digital services, including but not limited to www.ellab.com, (the "Service") and the choices you have associated with that data. We use your data to provide and improve the Service, and by using the Service, you agree to the collection and use of information in accordance with this policy.

#### **Data Controller and Contact Information**

The Ellab entity that you have entered into a contract with, contacted or in other ways interacted with in accordance with the purposes as set out below, is the data controller for processing your personal data for the said activities. The list of Ellab entities can be found here.

For any questions about this Privacy Policy, please contact us by email <u>GDPR@ellab.com</u> or by mail to Ellab, Trollesmindealle 25, 3400 Hillerod, Denmark.

### Processing Purposes and Legal Basis for Processing

Ellab uses the collected data for various purposes such as providing and maintaining the Ellab's service, notifying you about changes to our service, providing customer care and support, providing analysis or valuable information so that we can improve the Service, monitoring the usage of the Service, and detecting, preventing and addressing technical issues.

This privacy policy therefore describes how Ellab processes your personal data and the legal basis for the provision of services.

In connection with the submission of your data, it will always be stated whether the submission is voluntary or necessary for completing the desired action.

Your personal data is collected and processed in one or several of the below situations:

- When you sign up to receive email marketing (newsletters): We may process your personal data for the purpose of sending you newsletters and conducting other marketing activities. We rely on your consent in accordance with the GDPR art. 6(1)(a) for our processing of personal data when sending email marketing and newsletters to you. You have the right to withdraw your consent at any time. Further, by providing such marketing consent, your professional information will be registered in our CRM system and may be shared on a fully anonymized basis with our advertising partners, such as Google Ads and LinkedIn, for allowing Ellab to better target its advertising activities while still protecting our (potential and present) customer's identity. To ensure effective ways of anonymization (e.g. by way of hashing, pseudonymization, generalization and aggregation), the data may be shared with third-party service providers for such processing.
- When you enter and browse our websites: When using our websites, cookies will be placed in accordance with your cookie consent and the information provided in the cookie-pop-up, which is always available on the website. This may entail the processing of your personal data, hereunder a unique ID number, the IP address, geographical location, the sites you visit, as well as further technical information on your behaviour on the website. We rely on the legitimate interest in accordance with the GDPR art. 6(1)(f) for giving you the best possible website experience for the processing of personal data when placing statistical and functional cookies. To the extent you have previously



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consented to receiving marketing material, we will combine this information with the accepted statistical cookies in accordance with our legitimate interest, cf. the GDPR art. 6(1)(f). We rely on your consent in accordance with the GDPR art. 6(1)(a) for our processing of personal data when placing marketing cookies. We always collect your permission (i.e. cookie consent) in accordance with the applicable cookie legislation prior to the placement of cookies. You prior permission is, thus, a condition for the processing of personal data through cookies.

- When you visit our facilities: We will process your personal data to identify you for visitor registration (name, company, position, email, telephone number) and if you access our free guest Wi-Fi (IP and Mac addresses). At some Ellab locations there may be surveillance cameras, and if you appear on any footage, this will entail the processing of your personal data. The legal basis for these processing activities is the GDPR art. 6(1)(f), as it is in our legitimate interest to control access, enable you to access Wi-Fi during your visit and to have video surveillance at our physical locations for security and crime prevention purposes.
- When you contact us: The legal basis for such processing is the GDPR art. 6(1)(b) and/or (f). The legitimate interest under (f) is for us to be able to respond to your inquiry.
- When you download our brochures: The legal basis for such processing is the GDPR art. 6(1)(b).
- When you download our software or applications: The legal basis for such processing is the GDPR art. 6(1)(b).
- When you sign up for an online or physical event, webinar, etc: We will collect personal information about you in connection with your communication and interaction with us. We will only process basic personal data, including name, title or position, email address, telephone and your place and address of employment as well as VAT number. The legal basis for such processing is the GDPR art. 6(1)(b) and/or (f). If you do not wish to receive course invitations in the future, you can unsubscribe at any time by clicking the link at the bottom of the message you receive.
- When you interact with us on social media: Ellab is active on various social media platforms, including LinkedIn, YouTube and Instagram. We collect your personal data when you interact with us on social media. We also collect data from the respective social media operator, which is intended to provide us with statistical information about the use of our content and to advertise our content. Our processing is carried out in accordance with the GDPR art. 6(1)(f), as social media presence is necessary to pursue our legitimate interest in marketing and to obtain knowledge about users of Ellab's social media, as well as to communicate with users of Ellab's social media.
- When you are part of an Ellab "user panel": Ellab stores contact details and professional information on persons employed by customers and cooperation partners as well as private individuals that have special skills with interest for Ellab. All persons are therefore part of the "user panel" due to their professional capacity and the persons and/or the entities they represent (as the case may be) signs a confidentiality undertaking and are therefore aware and informed of any processing activities prior to commencement hereof. Ellab may contact the "user panel" for the purpose of gaining further insight into market needs and preferences, including for testing of prototypes and potential new



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features of existing products, etc. whereas the processing may also imply voice-and video recording of interviews, which may be disclosed to third-party service providers to facilitate the user panel and to provide ancillary service activities for Ellab's effectively management thereof. The legal basis for the said activities is the legitimate interest of Ellab according to GDPR art. 6(1)(f), hereunder as persons involved are participating on voluntary basis and subject to prior information of the above.

In connection with interacting in the user panel, Ellab may also process sensitive personal information concerning health information about disabilities to support Ellab's endeavours to make our products and services more user-friendly and accessible to all. A limited number of employees within Ellab's RnD-department, who are tasked with conducting and analysing such user research-activities, have access to the personal data collected. These employees only have access to see and use the information to the extent necessary to develop and operate our products. Your data will be stored until you withdraw your consent or unsubscribe from the user panel. The individual answers provided will be stored for up to 2 years, provided, however, that your answer will be anonymized after 6 months. The legal basis for Ellab's processing of personal data through participation in user panels is consent, cf. Article 6(1)(a) and Article 9(2)(a) of the General Data Protection Regulation with regard to the aforementioned health information.

• When you are registered in our CRM system: By processing your data in our CRM, we can streamline our services, offer quick and personalized support, and keep you informed about relevant products or updates. We rely on the legitimate interest in accordance with the GDPR art. 6(1)(b) or (f) when registering you in our CRM system, allowing us to provide a tailored service, and ensure that your preferences are respected. As stipulated above, we rely on your consent in accordance with the GDPR art. 6(1)(a) for sending email marketing and sharing your data registered in our CRM system for the purpose of targeting our advertising activities.

#### **Cookies & Tracking**

We use cookies and similar tracking technologies to track the activity on our Service and hold certain information. However, you can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. If you do not accept cookies, our Service will remain fully operational as it's not dependent on additional cookies.

### Sharing and Transfer of Personal Data

Your personal data may also be shared within Ellab affiliated companies. A list of all affiliated companies may be found on the following link: Link.

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country, or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction.

In the event of transfers to countries outside EU/EEA, such transfers are carried out in compliance with the EU Commission Standard Contractual Clauses or the EU-US Data Privacy Framework, which provide adequate safeguards for the protection of your personal data. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy and in compliance with these clauses.



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Ellab may disclose your Personal Data in the good faith belief that such action is necessary to comply with a legal obligation, protect and defend the rights or property of Ellab, prevent or investigate possible wrongdoing in connection with the Service, protect the personal safety of users of the Service or the public, or protect against legal liability.

### **Security of Data**

The security of your data is important to us. We have implemented robust security measures to prevent unauthorized access, disclosure, alteration, or destruction of data. These measures include encryption of all data transmitted to and stored in our servers, strict access control measures, regular security audits, regular data security training for all Ellab employees, and a comprehensive incident response plan.

### **Your Data Protection Rights**

Every user is entitled to specific data protection rights, including the right to access, rectification, erasure, restrict processing, object to processing, and data portability. You also have the right to object to the collection and further processing of your personal data including profiling/automated decision-making. If you would like to exercise any of these rights, please contact us at GDPR@ellab.com.

#### Service Providers

We may engage third-party companies and individuals to facilitate our Service, to provide the Service on our behalf, or to perform Service-related services. These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose. We'll ensure to conclude data processor agreements with all external data processors.

We work with third-party Service Providers such as Google Analytics, Google Ads, LinkedIn, and Salesforce to monitor and analyze the use of our Service. These services assist us in understanding the interactions of users with our Service, enabling us to refine and improve our offerings based on these insights.

### Google Analytics and Google Ads

Google provides us with analytics and advertising services. Google Analytics helps us understand how users interact with our Service by tracking and reporting on website traffic. Google Ads, on the other hand, allows us to tailor our advertising to ensure it is relevant and engaging for our users. Google may use the collected data to contextualize and personalize the ads of its own advertising network. If you prefer, you can opt-out of sharing your activity on our Service with Google Analytics by installing the Google Analytics opt-out browser add-on.

### LinkedIn

LinkedIn provides us with valuable insights into our users' professional networks and interests and helps us to improve our marketing efforts. Any data collected by LinkedIn is as a main rule anonymized and doesn't personally identify you. However, we may run specific campaigns or the like pursuant to which personal information provided by you is collected and processed in



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accordance with our legitimate interest hereto as further elaborated above concerning "When you interact with us on social media".

#### Salesforce

We utilize Salesforce services for marketing automation. This helps us understand how our users interact with our marketing materials, and enables us to provide more personalized experiences.

#### **Links to Other Sites**

Our Service may contain links to other sites not operated by us. If you click on a third-party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy of every site you visit. Please note that we do not control and are not responsible for the content, privacy policies, or practices of any third-party sites or services.

### Deletion of personal data

We will delete your personal data when we no longer need to process them in relation to one or more of the purposes set out above. However, the data may be processed and stored for a longer period in anonymized form.

We take appropriate measures to ensure that we process and store your personal data based on:

- a) as a minimum for the time period in which we deliver a Service to you;
- b) in accordance with law, contract, or our legal obligations; or
- c) as long as the data are necessary in order for the purposes for which they are collected, or longer if it is required by contract, applicable law, or for statistical purposes governed by appropriate security measures.

#### Withdrawal of consent

You may, at any time, withdraw any consent you have given, and we will delete your personal data, unless we can continue the processing based on another purpose. If you wish to withdraw your consent, please contact us at <a href="mailto:GDPR@ellab.com">GDPR@ellab.com</a>.

#### **Children's Privacy**

Our Service does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and are aware that your child has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

#### Right to File a Complaint

In accordance with Article 77 of the GDPR, you have the right to file a complaint with the Danish Data Protection Agency if you believe that our processing of your personal data infringes the GDPR. If you wish to appeal against the processing of your personal data, please contact us at



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<u>GDPR@ellab.com</u>. You may also file a complaint with your local data protection authorities, a list of which can be found here: https://edpb.europa.eu/about-edpb/board/members\_en.

### **Changes to This Privacy Policy**

We may update our Privacy Policy from time to time. Should any changes occur, we will inform you by posting the new Privacy Policy on this page. We encourage you to review this Privacy Policy periodically to stay informed about any changes. Changes to this Privacy Policy come into effect when they are posted on this page.

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