

PRIVACY POLICY FOR NORDICAPIGATEWAY.COM

1. In general

- 1.1. In this Privacy Policy, "Nordic API Gateway", "NAG", "we", "us", and "our" refers to Nordic API Gateway A/S, with registered address at Mejlgade 48b, 2. th., DK-8000 Aarhus C, Denmark. When using the NAG website, (the "Site"), your personal data is processed in accordance with this policy.
- 1.2. Data processed in relation to the Site will be processed in accordance with applicable legislation and the at any time valid guidelines issued by the Danish Data Protection Agency.

2. Data Controller

- 2.1. We are the data controller of personal data processed in connection with the following activities and services in relation to the Site:
 - Contact
 - Newsletter / Get notified
 - Ebooks sign up
 - Sign up – Client Portal
 - Logging

3. What processing is performed?

3.1. Contact

3.1.1. Data

When contacting us through the Site, we ask you to provide information on your name, your e-mail address, name and type of the company in which you work and your message or question to us.

3.1.2. Purpose

Your personal data is collected in order for us to be able to react to your message or reply to your question. Depending on the nature of your message to us, we may also process this, in order to comply with legal requirements. We also use your information in relation to our marketing.

3.1.3. Storage

We generally store such information and your messages for up to 1 year, in order for us to follow and follow up on such communication, at which time we either delete or anonymise your message or question. If your message to us, is of a legal nature, we may store the information, your message and our reply to you for a period of up to 3 years.

3.1.4. Legal basis

Our legal basis for processing said personal data is our legitimate interest in being able to respond to such communication and using input obtained through such communication in the running of our business and providing our services, including marketing.

If your message is of a legal nature, we may process and store the information in order for us to comply with legal obligations.

3.2. **Newsletter / Get notified**

3.2.1. Data

When you request our newsletter, we collect information on your name, e-mail address and the organisation in which you work. Further we collect and store information on the consent you have provided to us.

When forwarding a newsletter to you, we further collect information on whether you open the newsletter, if and which links in the newsletter you click on, whether our e-mail bounces, and the time you have spent viewing our newsletter e-mail.

3.2.2. Purpose

We collect and process said data in order for us to be able to provide you with the requested newsletter, of which some are segmented on business sectors, and in order for us to be able to show compliance with legal requirements. We also use your information in relation to our other marketing and for optimising our newsletter.

3.2.3. Storage

We store your data and information on the consent which you have provided us, as well as information on your possible withdrawal of consent for as long as we have a valid consent for sending you our newsletter and a period of 3 years thereafter.

3.2.4. Legal basis

The legal basis for our collecting and storing your information allowing us to send the newsletter is your consent, and for us to comply with legal obligations. We also use the information based on our legitimate interest in optimising our newsletter and marketing our services.

3.3. **Ebooks sign up**

3.3.1. Data

When you sign up for receiving one or more of our ebooks and you are not already a user of our client portal, we collect information on your name, e-mail address, country, name of the organisation in which you work, industry and company size.

Further we collect and store information on the consent you have provided to us.

3.3.2. Purpose

We collect and process said data in order for us to be able to provide you with the requested ebooks, and in order for us to be able to show compliance with legal requirements. We also use your information in relation to our other marketing and for optimising our services.

3.3.3. Storage

We store your data and information on the consent which you have provided us, as well as information on your possible withdrawal of consent for as long as we have a valid consent for sending you ebooks and a period of 3 years thereafter.

3.3.4. Legal basis

The legal basis for our collecting and storing your information allowing us to send ebooks is your consent, and for us to comply with legal obligations. We also use the information based on our legitimate interest in marketing our services.

3.4. **Sign Up – Client Portal**

3.4.1. Data

When you sign up, in order to become a user of our Client Portal on the Site (creating a user profile), we collect information your e-mail address, a password, the name of the organisation in which you work and your phone-number.

If you sign up by using Google og GitHub, information on your e-mail-address is collected from such service provider. When you choose to use such third party service for signing up on the Site, we receive further information, e.g. on your name, from the third party. However, such further information is discarded and not used.

3.4.2. Purpose

We collect such information in order to handle users of our Site and to issue you access to create and manage Nordic API Gateway apps and keys, granting access to our API's.

3.4.3. Storage

We store your information provided in relation to your creation of a user profile for as long as you keep a user profile with us.

3.4.4. Legal basis

Our legal basis for collecting and processing your information collected in relation to your creation of a user profile, is your consent.

3.5. **Logging**

3.5.1. Data

When using the Site, we log information on which IP-address has been used for accessing the Site, the time and date of usage, time spent on our Site, which actions has been performed, and device

information, i.e. information on operating system, browser information and settings as well as referrer and high-level geo-location.

The source of these data are in many situations Google and LinkedIn, through the use of cookies, see below.

3.5.2. Purpose

The purpose of such logging is for us to make technical analysis, improvements and optimizations of the Site, as well as being able to track and hinder any possible illegal activities on the Site. Also we use such information for marketing purposes.

3.5.3. Storage

We store such logs for a period of up to 1 year.

3.5.4. Legal basis

The legal basis for collecting and storing such logged information is our legitimate interest in making improvements and optimization of the Site, as well as our legitimate interest in preventing and pursuing any possible illegal activities. We also use the information based on our legitimate interest in optimising our newsletter and marketing our services.

4. Cookies etc.

When accessing the Site you are asked to accept our use of cookies, unless you have already accepted this.

You can read more about our use of cookies here.

5. Disclosure

- 5.1. The above-mentioned personal data which we process, will not be disclosed to third parties without your consent, except as described in this Privacy Policy, unless we are legally required to disclose the data, or if disclosure is necessary for us to protect ourselves or to enforce legal claims.

6. Privacy Rights

- 6.1. In accordance with the General Data Protection Regulation, you have certain legal rights, due to our processing of your personal data. These rights are:
 - At any time, you have the right to know what personal data we process about you; the purpose of the processing; from where your personal data was obtained; and the identity of any recipients of your personal information.
 - At any time, you have the right to rectify incorrect or misleading personal data that we are processing about you.

- In certain cases, you may require that the personal data we are processing about you are deleted.
- At any time, you are entitled to receive a copy of the personal data you have provided to us, in a commonly used and machine-readable format.
- You may at any time object to us processing your personal data due to your particular circumstances.
- At any time, you may object to our use of your personal data for direct marketing purposes, e.g. forwarding newsletters.

6.2. At any time, you can withdraw any consent you have provided to us either at the Site, by contacting us through the Site or by other means, or by using link in our electronic correspondence. See contact information for our DPO in section 9.

6.3. If you wish to make use of one or more of legal rights, as mentioned above in section 6.1, or wish for us to assist you with this, please contact our DPO, cf. section 9.

7. Confidentiality

7.1. We always handle your personal data confidentially. All our employees are subject to strict confidentiality requirements when processing personal data.

8. Changes to the policy

8.1. We reserve the right to change this privacy policy at any time without prior notice. In such situations the revised privacy policy will be made available on the Site.

9. Data Protection Officer

9.1. We have appointed a data protection officer who advises us regarding the processing of personal data in relation to the Service and who can guide you on how to exercise your rights. If you have any questions about this Privacy Policy or the processing of your personal data you may contact our Data Protection Officer by contacting Nordic API Gateway A/S, Att.: DPO, Mejlgade 48b, 2. th., DK-8000 Aarhus C, Denmark or dpo@spiir.com.

10. Complaints

10.1. If you wish to file a complaint regarding the processing of your personal data, we would like to hear from you. Our contact information can be found in section 9.1. You may also file a complaint with the Danish data protection authorities: Datatilsynet, Borgergade 28, 5. 1300 København K, Denmark or www.datatilsynet.dk, or your local data protection authorities.

11. Version

This Privacy Policy was issued in July 2019 and is valid until revised by us.