

## 1. In general

1.1. In this privacy policy, "Nordic API Gateway", "we", "us", and "our" refers to Nordic API Gateway that is a product of Spiir A/S, with a registered address at Mejlgade 48b, 2. th., DK-8000 Aarhus C, Denmark. When you use our [website](#), your personal data is processed in accordance with this policy.

1.2. Data processed in relation to our website will be treated in accordance with applicable legislation and at any time valid guidelines issued by the Danish Data Protection Agency.

## 2. Data controller

2.1. Nordic API Gateway is the data controller of personal data processed in connection with the following activities and services in relation to our website:

- Contact and support
- Marketing emails
- Newsletter and get notified of product and feature updates, as well as news, debates, events, webinars and more
- Form submission to get reports, ebooks, exclusive content, white paper and more
- Sign up for our Client Portal
- Logging

## 3. What processing is performed?

### 3.1. Contact and support

#### 3.1.1. Data

When contacting us through our website, we ask you to provide information such as your name, e-mail address, company name, industry and more about your work and your message or question to us. We also process contact information when you have been in contact through other means, such as physical events or conferences.

### 3.1.2. Purpose

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

### 3.1.3. Storage

We generally store information and your messages for up to one (1) year in order for us to follow up on such communication. After that, we 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 for a period of up to three (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. We also use such communication to improve the way we respond to you and the way we run our business (GDPR art. 6(1)(f)).

If your message is of a legal nature, we may process and store the information in order for us to comply with legal obligations (GDPR art. 6(1)(c)),

## 3.2. Newsletter / Get notified of product and feature updates, as well as news, debates, events, webinars and more.

### 3.2.1. Data

When you request our newsletter or you request to be notified about the matters mentioned above in section 3.2, we collect information regarding your name, e-mail address, the organisation you work for and more. We also collect and store information on the consent you have provided to us.

When forwarding a newsletter or notification to you, we further collect information on whether you opened the newsletter, participated to the debate, registered to the event, attended the webinar etc., which links in the newsletter you click on (if any), whether our e-mail bounces and the time you have spent viewing our newsletter.

### 3.2.2. Purpose

We collect and process data in order for us to be able to provide you with the requested newsletter. Some of these are segmented on business sectors, and in order for us to be able to show compliance with legal requirements. If you opt in to receive marketing emails, we also use your information to send you relevant marketing and for optimising our

newsletter.

### 3.2.3. Storage

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

### 3.2.4. Legal basis

Your consent (GDPR art. 6(1)(a)) is our legal basis for us collecting and storing your information, and for allowing us to send you newsletters.

When we are legally obliged to process your personal data, the legal basis in this situation is the necessity to comply with legal requirements (GDPR art. 6(1)(c)).

We use the information based on our legitimate interest in optimising our newsletter and marketing our services (GDPR art. 6(1)(f)).

## 3.3. Form submission to get reports, ebooks, exclusive content, white paper and more.

### 3.3.1. Data

When you sign up to receive one or more of our materials and you are not already a user of our client portal, we collect information regarding your name, e-mail address, country, name of the organisation you work at, industry and company size.

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

### 3.3.2. Purpose

We collect and process data in order for us to be able to provide you with the requested material, 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 the requested material and a period of three (3) years thereafter.

### 3.3.4. Legal basis

Your consent (GDPR art. 6(1)(a)) is our legal basis for collecting and storing your information, and for allowing us to send you newsletters.

We may need to show compliance with legal requirements, in which case the legal basis for processing your personal data is -GDPR art. 6(1)(c).

We also use the information based on our legitimate interest in optimising our newsletter and marketing our services (GDPR art. 6(1)(f)).

### 3.4. Sign Up – Client Portal

#### 3.4.1. Data

When you sign up to become a user of our client portal on our website, we collect information such as your e-mail address, password, the name of the organisation in which you work and your phone number.

If you sign up by using Google or GitHub, information regarding your e-mail address is collected from these service providers. When you choose to use a third-party service to sign up for our website, we receive further information (your name) from the third party. However, such further information is always discarded and not used.

#### 3.4.2. Purpose

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

#### 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 in relation to your creation of a user profile is your consent (GDPR art. 6(1)(a)).

### 3.5. Logging

#### 3.5.1. Data

When using our website, we log information on which IP address has been used for accessing our website, the time and date of usage, time spent on our website, which

actions have 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 sources of this data are in many situations Google and LinkedIn, through the use of cookies (see below in Section 4).

### 3.5.2. Purpose

The purpose of such logging is for us to make technical analyses, improvements and optimisations of the website, as well as to be able to track and hinder any possible illegal activities on the website. We also use such information for marketing purposes.

### 3.5.3. Storage

We store such logs for a period of up to one (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 optimisation of the website, 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. (GDPR art. 6(1)(f)).

## 4. Cookies

You are asked to accept our use of cookies upon entering the website, 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 (GDPR), you have certain legal

rights regarding our processing of your personal data. These rights are:

- You have the right, at any time, 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.
- You have the right, at any time, 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 is deleted.
- You are entitled, at any time, to receive a copy of the personal data you have provided to us in a commonly used and machine-readable format.
- You may object, at any time, to us processing your personal data due to your particular circumstances.
- You may object, at any time, to our use of your personal data for direct marketing purposes(e.g. forwarding newsletters).

6.2. You can withdraw, at any time, any consent you have provided to us either at the website, by contacting us through the website or by other means, or by using the 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 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 in confidence. 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 website.

## 9. Data protection officer

9.1. We have appointed a data protection officer who advises us regarding the processing of

personal data 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@spiiir.com](mailto:dpo@spiiir.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](http://www.datatilsynet.dk), or with your local data protection authorities.

## 11.

### Version

This privacy policy was issued in October 2020 and is valid until revised by us.