

Privacy Policy

*This template is meant for B2B companies **not** collecting or processing sensitive data or data about children.*

If your company is B2C, a public body, organisation etc. this may have an impact on several of the sections. Fyi,

- *Texts marked in yellow **must** be reviewed/ revised to reflect your company's processing activities, how you're using data, for how long and for what purposes*
- *Other texts should be reviewed and, where needed, revised to reflect your company.*

Please note that this privacy policy template is supplied "as is", will not be reviewed or updated and comes with no guarantees, commitments or otherwise regarding its legality.

February 2021

Privacy Policy

Introduction

This privacy policy ("policy) explains how we process your personal data ("your data") , incl. what we use it for and how we store and protect it.

Why? Because we care about your privacy.

It is important to find out whether your company is required to have a data protection officer. If you don't have a data protection officer

Who are we

We are the company responsible for the processing of your data in accordance with this policy. Here's our information:

<p>and aren't required to have one, this section should be deleted.</p> <p>If you are outside the EU (e.g. in the UK or US) you need a representative in the EU. If you are within the EU, DELETE section.</p>	<p>[Full company name]</p> <p>[Address line - street and no]</p> <p>[City and postal code]</p> <p>[Country]</p> <p>[Company number]</p> <p>[Email address]</p> <p>[Telephone number]</p> <p>To make the policy more user friendly, we use "we", "us", "our" etc. to describe our company.</p> <p>Here is the contact details of our data protection officer:</p> <p>[Email address]</p> <p>[Telephone number]</p> <p>The contact details of our EU representative are as follows:</p> <p>[Company name]</p> <p>[Address line]</p> <p>[Address line]</p> <p>[Email address]</p> <p>[Telephone number]</p> <p>When we talk about our "website" we mean URL, and the other sites and apps we own and operate.</p> <p>When we refer to "you" we mean you as a user of our website, app or customer of our online services or products.</p>
	<p>Links to other websites etc.</p> <p>On our website, in our emails and on our social-media profiles, we may have links to other companies, apps or websites ("other websites") that aren't ours. This policy doesn't cover how those other websites process your data. We encourage you to read the privacy notices on the other websites you visit.</p>
<p>Purposes #1-6 require you to describe the different purposes that your company is using personal data for.</p> <p>Purposes are very important.</p> <p>The same goes for what data you are collecting for each</p>	<p>Why, what and for long we process your data</p> <p>We process your data for these purposes:</p> <p>Purpose #1:</p> <p>Insert description</p> <p>We process the following ordinary data about you:</p> <ul style="list-style-type: none"> ● Insert personal data ● Insert personal data ● Insert personal data

purpose, the legal basis for the processing as well as the data retention and from what sources the data has been collected.

- Insert personal data

We don't process any sensitive data.

We process your data on the following legal bases:

- Insert legal basis descriptions, e.g. consent according to GDPR Article 6.1.a, contract performance GDPR Article 6.1.b, GDPR Article 6.1.f etc

We will retain your data processed for this purpose for:

- Up to [period] from [reference].
- Up to [period] from [reference].

We collect your data from:

- Insert source
- Insert source
- Insert source

Purpose #2:

Insert description

We process the following ordinary data about you:

- Insert personal data
- Insert personal data
- Insert personal data
- Insert personal data

We don't process any sensitive data.

We process your data on the following legal bases:

- Insert legal basis descriptions, e.g. consent according to GDPR Article 6.1.a, contract performance GDPR Article 6.1.b, GDPR Article 6.1.f etc

We will retain your data processed for this purpose for:

- Up to [period] from [reference].
- Up to [period] from [reference].

We collect your data from:

- Insert source
- Insert source
- Insert source

Purpose #3:

Insert description

We process the following ordinary data about you:

- Insert personal data
- Insert personal data
- Insert personal data
- Insert personal data

We process your data on the following legal bases:

- Insert legal basis descriptions, e.g. consent according to GDPR Article 6.1.a, contract performance GDPR Article 6.1.b, GDPR Article 6.1.f etc

We will retain your data processed for this purpose for:

- Up to [period] from [reference].
- Up to [period] from [reference].

We collect your data from:

- Insert source
- Insert source
- Insert source

Purpose #4

Insert description

We process the following ordinary data about you:

- Insert personal data
- Insert personal data
- Insert personal data
- Insert personal data

We process your data on the following legal bases:

- Insert legal basis descriptions, e.g. consent according to GDPR Article 6.1.a, contract performance GDPR Article 6.1.b, GDPR Article 6.1.f etc

We collect your data from:

- Insert source
- Insert source
- Insert source

We will retain your data processed for this purpose for:

- Up to [period] from [reference].

Purpose #5

Insert description

We process the following ordinary data about you:

- Insert personal data
- Insert personal data
- Insert personal data
- Insert personal data

We process your data on the following legal bases:

- Insert legal basis descriptions, e.g. consent according to GDPR Article 6.1.a, contract performance GDPR Article 6.1.b, GDPR Article 6.1.f etc

We collect your data from:

- Insert source
- Insert source
- Insert source

We will retain your data processed for this purpose for:

	<ul style="list-style-type: none"> • Up to [period] from [reference]. • Up to [period] from [reference]. <p>Purpose #6</p> <p>Insert description.</p> <p>We process the following ordinary data about you:</p> <ul style="list-style-type: none"> • Insert personal data • Insert personal data • Insert personal data • Insert personal data <p>We process your data on the following legal bases:</p> <ul style="list-style-type: none"> • Insert legal basis descriptions, e.g. consent according to GDPR Article 6.1.a, contract performance GDPR Article 6.1.b, GDPR Article 6.1.f etc <p>We collect your data from:</p> <ul style="list-style-type: none"> • Insert source • Insert source • Insert source <p>We will retain your data processed for this purpose for:</p> <ul style="list-style-type: none"> • Up to [period] from [reference]. • Up to [period] from [reference]. <p>Additional information</p> <p>If you would like more information about our legal basis for processing your data, feel free to contact us. Some of the grounds for processing your data overlap, so there may be several reasons which justify us processing your data.</p> <p>We do not sell or rent your data to marketers or third parties.</p> <p>We may use your data in other ways than described here but we'll inform you about these purposes when we collect your data.</p> <p>Please note that special circumstances or legal requirements may mean that such periods may be shorter or longer, depending on the purpose of complying with legal requirements for the erasure or keeping of information.</p>
<p>If you have information about your security practices on your website, add a link. Otherwise, delete the sentence “<i>To learn more about our current practices and policies regarding security, here's a link to more information.</i>”.</p>	<p>Keeping your data safe</p> <p>We use reasonable organisational, technical and administrative measures to protect your data within our company.</p> <p>The Internet is not a 100% secure environment and that means we cannot guarantee the security of the data you transmit to us. Emails sent via the Internet might not be encrypted, so we advise you not to include any confidential or sensitive information in your emails to us.</p> <p>To learn more about our current practices and policies regarding security, here's a link to more information:</p>

<p>If you share personal data with others than the three mentioned groups, please remember to add them.</p> <p>Include a link to your cookie policy in the section starting "Read our cookie policy...". If you don't have a cookie policy template, we can help.</p>	<h3>Third parties and processors</h3> <p>We use companies (processors) to help us deliver our services to you, e.g. to Insert description.</p> <p>When we use a processor we make sure that there is a legal agreement in place regarding how they will be handling data on our behalf.</p> <p>We'll also make sure that they have appropriate security measures in place and if they are located outside the EU, we'll of course make sure that there is a legal agreement in place allowing us to give them access to the data (see more below).</p> <p>We share your data with:</p> <ul style="list-style-type: none"> • Insert type of processor • Insert type of companies that you share data with • Insert other thirty parties if applicable <p>Here's some of the suppliers we use:</p> <ul style="list-style-type: none"> • Insert company name • Insert company name <p>Read our cookie policy regarding the suppliers we use for those services.</p> <p>In the event that we are involved in a bankruptcy, merger, acquisition, reorganization, your information may be transferred as part of that transaction. This policy will continue to apply to your information also after the information has been transferred to the new entity.</p>
	<h3>Transfer to countries outside the EU/EEA</h3> <p>In some cases, we'll transfer personal data to the following countries outside the EU/EEA:</p> <p>[insert list of relevant countries outside the EU/EEA].</p> <p>The transfers will take place on the basis of the following legal basis:</p> <p>[Choose from the below transfer bases and delete the rest]</p> <ol style="list-style-type: none"> [The country/countries has/have been deemed by the Commission of the European Union to have an adequate level of protection of personal data.] [The country/countries has/have not been deemed by the Commission of the European Union to have an adequate level of protection of personal data. We will provide appropriate safeguards for the transfer:] <ul style="list-style-type: none"> • [through the use of "Model Contracts for the Transfer of Personal Data to Third Countries", as published by the Commission of the European Union, or any other contractual agreement approved by the competent authorities. You may obtain a copy of the contract/agreement by contacting Us at [insert email address].] • [through the use of an approved code of conduct pursuant to Article 40 an approved certification mechanism pursuant to Article 42. You may obtain a copy of the code of conduct/certification document by contacting Us at [insert email address].]

Your rights

You have the following rights:

1. Your right of access and rectification - You have the right to ask us for copies of your personal data or ask us to rectify information you think is inaccurate. There are some exemptions, which means you may not always receive all the information we process but as a main rule you can always contact us and ask for your information.
2. Your right to erasure - You can ask us to erase your information in certain circumstances.
3. You also have the right to have the processing of your data restricted.
4. Your right to withdraw your consent: If processing of your data is based on your consent, you have the right to withdraw your consent at any time. Your withdrawal will not affect the lawfulness of the processing carried out before you withdrew your consent. You may withdraw your consent by [insert].
5. Your right to restriction of processing and object to processing - You have the right to ask us to restrict the processing of your information and a similar right to object to processing.
6. Your right to data portability: You have the right to receive your data in a structured, commonly used and machine-readable format (data portability).
7. Where your data is processed for direct marketing purposes, you have the right to object at any time to the processing of personal data about you for such marketing.

The law gives us one month to respond to you, but we will try to respond sooner.

There may be conditions or limitations on these rights. It is therefore not certain e.g. you have the right of data portability in a specific case - this depends on the specific circumstances of the processing activity. You are always welcome to contact us and ask. The same goes for some of the other rights.

Complaints

You can always lodge a complaint with a data protection authority, for example [insert the data protection authority with supervisory authority of your company].

Assistance and additional information

You can take steps to exercise your rights by using the contact details above or [insert information on how to make use of rights, e.g. electronic form, email request etc.].

If you have questions about the policy, feel free to contact us by using the contact details in this policy.

	<p>How to unsubscribe to email marketing material?</p> <p>If you have subscribed to our newsletters or asked to receive marketing material from us, you can always unsubscribe. In all these emails we include an unsubscribe link and you always click the link and easily unsubscribe.</p> <p>You can also unsubscribe by sending us an email to INSERT EMAIL</p>
<p>If you are selling to children, the policy needs to be amended.</p> <p>Add in the age limitation that you have</p>	<p>Children and Our Services</p> <p>Our services and website are not directed to children, and you may not use our services if you are under the age of XX. You must also be old enough to consent to the processing of your information in your country.</p>
	<p>Changes to this policy</p> <p>Sometimes we need to make changes to this policy to reflect our current practices. We will take reasonable steps to let you know about changes via our website.</p> <p>If you are a registered user, we will notify you via email if significant changes are being made to the policy using the email address you gave us when you signed up.</p> <p>If you continue to use our website or services after the notification, we will regard this as your acceptance of our privacy practices.</p>
	<p>Last updated and Version</p> <p>The policy was last updated on April 14th, 2021.</p> <p>Version XXX</p>