



# Data Protection and Privacy Policy

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## Document info

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## 1. Introduction

- 1.1 This Data Protection and Privacy Policy (the "**Policy**") describes how Wingmen Solutions ApS ("**us**", "**we**" or "**our**") processes personal data in its role as data controller under the General Data Protection Regulation (GDPR). This document does not constitute a data processing agreement. Data processing agreements are entered into separately with relevant suppliers in accordance with GDPR article 28.
- 1.2 The Policy has been prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included therein on information to be provided to you.

## 2. Collecting personal data with cookies

- 2.1 By visiting and using our website, cookies are collected and used based on your consent. Information in the cookies include:
  - a. browser type
  - b. device type
  - c. IP Address
  - d. approximate geographical location (e.g. city or region - not exact address)
  - e. search terms on our website
  - f. search terms that led the user to Wingmen's website
- 2.2 Cookie data is to improve the website and user experience.
- 2.3 Our use of cookies to collect personal data is in accordance with Section 3 of the Cookie Executive Order (No. 1148 of 9 December 2011).
- 2.4 If you wish to restrict or reject the cookies placed on your computer when you visit our website, you can do so at any time by changing your browser settings. However, please note that if you reject cookies, it will affect the functionality of the website, which means that there are features on the website that you will not be able to see. Every browser allows you to delete cookies collectively or individually. How this is done depends on the browser you are using. Remember to delete cookies in all browsers if you use several different browsers.
- 2.5 We use Google Analytics as a data processor for statistical purposes. The processing only takes place if you have consented to statistics via our

cookie consent solution. Information is processed in pseudonymised form and is used exclusively for the analysis of the use of the website.

- 2.6 We use Usercentrics GmbH as a consent management platform on our website. In connection with the handling and documentation of consent, consent data is transferred to Usercentrics GmbH, Sendlingerstr. 7, 80331 Munich, which acts as data processor. Consent data includes information about the date and time of the visit and the granting or refusal of consent as well as technical device information. The processing takes place for the purpose of complying with our legal obligations pursuant to GDPR Article 7(1) (documentation of consent) and is based on GDPR Article 6(1)(c). Consent data is stored for up to 1 year and processed within the EU/EEA. You can read more about Usercentrics' processing of personal data in their privacy policy: <https://usercentrics.com/privacy-policy/>

### 3. Types of personal data processed

- 3.1 We process personal data about you when necessary and in accordance with applicable law. Depending on the specific circumstances, the personal data processed includes the following types of personal data:
- a) IP addresses
  - b) name
  - c) address
  - d) telephone number
  - e) title
  - f) company name
  - g) e-mail
  - h) registration and order history
- 3.2 If we need to collect more personal information than stated above, we will inform you by updating this policy.

### 4. Purposes of processing personal data

- 4.1 We will only process your personal data if we have a legitimate purpose, and if so in accordance with the rules of the GDPR. The personal data we collect about you will be processed for the following purposes:
- a) To deliver products or services
  - b) To facilitate a sales process
  - c) To send newsletters, direct marketing (such as e-mails, SMS and MMS',

- direct messages on social media, etc.), questionnaires
- d) To provide support and service messages, including responding to questions and complaints and sending updates about our products and services.
  - e) To provide service messages and information.

Processing of personal data in connection with forms and marketing takes place via our marketing automation platform to the extent relevant for the purposes stated above.

## 5. Legal basis for processing personal data

5.1 We only process your personal data when we have a legal basis for doing so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data takes place on the following grounds: only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) The legal basis for the processing of such personal data is consent in accordance with GDPR Article 6(1)(a). You may withdraw your consent at any time by contacting us using the contact details provided at the end of this policy. If you withdraw your consent, the processed personal data will be deleted, unless they can or must be processed for compliance with legal obligations.
- b) The processing is necessary for the performance of a contract to which the data subject is party, in accordance with GDPR Article 6(1)(b), first indent.
- c) The processing is necessary for the purposes of legitimate interests, where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data in accordance with GDPR Article 6(1)(f).
- d) The processing is necessary to take steps at the request of the data subject prior to entering into a contract in accordance with GDPR Article 6(1)(b), last indent.
- e) The processing is necessary to comply with applicable law in accordance with GDPR, Article 6(1)(c), including documentation of consent.

5.2 If we send you direct marketing, including by e-mail, we will ask for your prior consent in accordance with the applicable rules such as marketing acts.

## 6. Disclosure and transfer of personal data

- 6.1 We only transfer personal data to other entities where permitted or required by law. Our organisation is part of a group or group of companies with which personal data is, depending on the circumstances, shared.
- 6.2 We transfer personal data to the following recipients from the EU/EEA:
- a) Banks (e.g. in connection with payments, etc.)
  - b) Partners
  - c) Data processors
  - d) Suppliers
  - e) Tax authorities (e.g. in connection with accounting etc.)

- 6.3 From time to time, we use external entities as suppliers to assist us in providing our services. The external suppliers will not receive or process personal data unless applicable law permits such transfer and processing.

Where the external parties act in the role of data processor, the processing is always based on a data processing agreement in accordance with the requirements of the GDPR.

Where the external parties act in the role of data controller, the processing of personal data is based on the data protection policies of these external parties and the relevant legal bases, which the external parties are obliged to inform about, unless applicable law permits otherwise. In connection with the handling of forms, newsletters and marketing activities, we use Salesforce Account Engagement (formerly Pardot) as a data processor.

- 6.4 We transfer personal data to countries or international organisations outside the EU/EEA. Personal data is transferred to the following countries that are not subject to an adequacy decision pursuant to Article 45: United States.

Such transfers are based on standard contractual clauses (SCCs) on data protection drawn up or approved by the European Commission and possibly approved by a national data protection authority, ensuring an adequate level of protection.

- 6.5 If you have any questions about our use of data processors, cooperation with other data controllers, or the transfer of data to third countries, you can contact us for further information or documentation of our legal basis for such transfers.

## 7. Deletion and storage of personal data

7.1 We ensure that personal data is deleted when it is no longer necessary for the processing purposes described above. However, we will retain your personal data to the extent that we are legally obliged to do so, such as for accounting records and records. If you have any questions about our retention of your personal data, you can contact us at the email address mentioned in the last section of this policy.

## 8. Rights of the data subject

8.1 As a data subject under GDPR, you have a number of rights.

- a) You have the right to request access to the personal data we process about you, the purposes of the processing of the personal data, and whether we disclose or transfer your personal data to others.
- b) You have the right to have incorrect information rectified.
- c) You have the right to have certain personal data deleted.
- d) You may have the right to restrict our processing of your personal data.
- e) You have the right to object to our processing of your personal data based on reasons and circumstances relating to your particular situation. Objection can also be to the processing of personal data for the purpose of direct marketing purposes.
- f) You have the right not to be subject to a decision based solely on automated processes, without human intervention, unless the decision (1) is necessary for entering into or performing a contract between you and the us, (2) is authorised by law, or (3) is based on your explicit consent.
- g) If the processing of your personal data is based on your consent, you have the right to withdraw such consent at any time. Withdrawing your consent does not affect the lawfulness of the processing carried out prior to your withdrawal.
- h) You have the right to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- i) You can always file a complaint with the data protection authority.

8.2 Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to, for example data portability in a specific situation; it will depend on the circumstances of the processing.

8.3 You can find more information about data subject rights in the guidelines of the national data protection authorities.

- 8.4 Please use the contact details below if you wish to exercise your rights.
- 8.5 We try to meet your wishes regarding our processing of personal data, but you can always file a complaint with the data protection authorities.

## 9. Changes to this Policy

- 9.1 We reserve the right to update and change this Policy. If we do, we correct the date and the version at the top of this Policy. If we make significant changes, we will provide notification by way of a prominent notice, for example on our website or by direct message.

## 10. Contact

- 10.1 You may contact us at the below specified e-mail if you:

- a) disagree with our processing or consider our processing of your personal data infringes on the law,
- b) have questions or comments about this policy, or
- c) wish to invoke one or more of your rights as a data subject, described in this Policy.

If you have questions or comments about this policy or if you wish to exercise one or more of your rights, please contact us at:  
Info@wingmen.dk

## 11. Company information

Wingmen Solutions Aps  
Tobaksvejen 23B, 2. floor  
DK – 2860 Søborg  
[www.wingmen.dk](http://www.wingmen.dk)  
E-mail: info@wingmen.dk  
Company registration number: 36440228