



Management

Data protection and privacy policy

K2 Management
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Danmark
Company registration number: 30812743

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1. **Introduction**

- 1.1 This data protection and privacy policy (the "**Policy**") describes how K2 Management ("**us**", "**we**" or "**our**") collects and processes personal data relating to the purchase of services, membership, products or general use of our website.
- 1.2 The Policy is prepared and made available to comply with the general data protection regulation (2016/679 of 27 April 2016) (the "**GDPR**") and the rules included herein on information to be provided to you.

2. **Collecting personal data with cookies**

- 2.1 By visiting and using our website(s), cookies are collected and used on the basis of consent. Information in these cookies include browser type, search terms on our website(s), IP address, location at login, search terms on other website(s). (hereinafter "**Cookiedata**").
- 2.2 Cookiedata is used for improvement of the website(s) and the user experience, to perform targeted marketing.
- 2.3 Use of cookies for the purpose of collecting personal data is in accordance with the Cookie Order (No. 1148 of 9 December 2011), section 3.
- 2.4 If you wish to limit or decline the cookies placed on your computer when visiting our website you can do so at any time by changing your browser settings. However, you should be aware that if you decline or reject cookies it will impact the functionality of the website which means that there are features on the website that you will not be able to see. Any browser allows that you delete cookies collectively or individually. How this is done depends on the used browser. Remember to delete the cookies in all browsers, if you use several different browsers.

3. **Types of personal data processed**

- 3.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data: name, telephone number, email, IP addresses
- 3.2 If we need to collect more personal data than what is specified above, we will inform about this. Such information may be provided by our updating of this Policy.

4. **Purposes for processing the personal data**

- 4.1 We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:
 - a) To answer enquiries or complaints from users, customers or members.
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- b) To provide service messages and information to users, customers or members.
- c) To send direct marketing to users, customers or members.
- d) To send newsletters on e-mail.
- e) To perform profiling of users, customers or members to analyse and predict their preferences and/or behavior.
- f) To give support and service messages, including answering questions and complaints and send updates about our products and services.
- g) To improve our products, services or website.

5. **Legal basis for processing personal data**

5.1 We 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) If we have asked for a consent for the processing of specific personal data, the legal basis for such personal data is a consent, cf. article 6(1)(a) of the GDPR, as the consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed on the basis of consent is deleted, unless it can or must be processed, for example, in order to comply with legal obligations.

5.2 In addition to the above, in some instances we analyze individual customers' or users' personal preferences and/or behavior with the purpose of using such analyses for marketing, sales or similar commercial activities. Before we perform such processing, we will collect a consent hereto. We perform this processing activity for the following purposes: To analyze the preferences and behaviors on our website to deliver more relevant marketing campaigns.

5.3 Description of the logic involved in automatic individual decisions as well as the significance and the envisioned consequences of such automatic decisions for the data subject: Users will receive more relevant information based on their profiling. This has no effect on users' personal circumstances.

5.4 If we send you direct marketing, including by email, 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 pass on personal data to others when the law allows it or requires it, including when relevant and asked to do so by you or a data controller when applicable.

7. **Erasure and retention of personal data**

7.1 We ensure that the personal data is deleted when it is no longer relevant for the processing purposes as described above. We also retain personal data to the extent

that it is an obligation from applicable law, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned at the bottom of this Policy.

8. **Data subject rights**

- 8.1 Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:
- 8.1.1 The right of access: Data subjects have a right to ask for copies of the information that we process about them, including relevant additional information.
 - 8.1.2 The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.
 - 8.1.3 The right to erasure: In certain circumstances data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.
 - 8.1.4 The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, with the exception of storage, only be processed with the data subject's consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.
 - 8.1.5 The right to object: Data subjects have, in certain situations, a right to object to the legal processing of his or her personal data. Objection can also be to the processing of personal data for the purpose of direct marketing.
 - 8.1.6 The right to data portability: Data subjects have, in certain situations, a right to receive his or her personal data in a structured, commonly used and machine-readable format and have the right to transmit those data to another data controller without hindrance from the data controller to which the personal data has been provided.
- 8.2 More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to make use of his or her rights as described above, the data subject is asked to use the contact details provided at the end of this Policy.

We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others despite our endeavours wish to file a complaint, this can be done by contacting the national data protection authorities.



9. **Changes to this Policy**

9.1 We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example on our website or by direct message.

10. **Contact**

10.1 If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at privacy@k2management.com.