

Privacy and Cookie Policy for TwentyThree™

This policy covers the use of and interaction with the TwentyThree Aps (“TwentyThree”, “us”, “we”, or “our”) website (“Site”) hosted on twentythree.net and other properties under this domain. This document informs you of our policies regarding the collection, use and disclosure of Personal Data when you use the Site and the choices you have associated with such data.

This policy applies specifically where we are acting as a Data Controller with respect to Personal Data. For policies related to products offered by TwentyThree and where we act as Data Processor, please refer to the relevant terms, conditions and agreements at <https://www.twentythree.net/policies>.

By using the Site, you agree to the collection and use of information in accordance with this policy. If you do not agree with the data practices described in this Privacy Policy, you should refrain from using the Site or any other TwentyThree products and services.

We may update this policy from time to time. We will notify you of any changes by posting the new Privacy Policy on <https://www.twentythree.net/policies>. Notwithstanding such notifications, we encourage you to review this Privacy Policy periodically.

Definitions

“**GDPR**” means the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation).

“**Personal Data**” shall mean any information relating to an identified or identifiable natural person. An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. This is in accordance with the definition by the European Union’s General Data Protection Regulation (“GDPR”).

“**Processing**” shall mean any operation or set of operations which is

performed on personal data, e.g. collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation. This is in accordance with the definition by the GDPR.

“The Data Controller” determines the purposes and means of the personal data processed in connection with this Agreement. This is in accordance with the definition by the GDPR and The Danish Act on Processing of Personal Data.

“The Data Processor” processes data on behalf of the Data Controller. This is in accordance with the definition by the GDPR and The Danish Act on Processing of Personal Data.

“The Data Subject” means the identified or identifiable person to whom Personal Data relates.

“Usage Data” is data collected automatically either generated by the use of the Site or from the Site infrastructure itself (for example, the duration of a page visit).

Types of data collected

We collect several different types of information for various purposes to provide our Site to you and constantly improve it.

Personal data

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you ("Personal Data"). Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Phone number
- Address, State, Province, ZIP/Postal code, City
- IP address
- Company details, such as revenue, turnover, address and central information.
- Cookies and Usage Data
- Your points of interest when it comes to the services TwentyThree provides.
- Your personal interests and intent when interacting with TwentyThree.

We may use your Personal Data to contact you with newsletters, marketing or promotional materials and other information that may be of interest to you. At any time, you may opt

out from receiving any, or all, of these communications from us by following the unsubscribe link or instructions provided in any email we send.

Personal data can also include information about you that is available on the Internet, such as from Facebook, LinkedIn, Twitter and Google, or publicly available information that we acquire from third-party service providers.

In the usage of the Site, TwentyThree will not collect, store nor use sensitive personal information such as credit or debit card numbers, personal financial account information, Social Security numbers, passport numbers, driver's license numbers or similar personal identifiers, racial or ethnic origin, physical or mental health condition or information, or other financial or health information.

Usage Data

We may also collect information on how the Site is accessed and used ("Usage Data"). This Usage Data may include, but is not limited to, information such as your computer's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

We Never Sell Personal Information

We will never sell your personal information to any third party.

Data from tracking cookies

We use cookies and similar tracking technologies to track the activity on our Site and hold certain information.

Cookies are files with small amounts of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies also used are beacons, tags, and scripts to collect and track information and to improve and analyze our Site.

You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some parts and features of our Site.

Examples of Cookies we use:

- **Session Cookies.** We use Session Cookies to operate our Site.
- **Preference Cookies.** We use Preference Cookies to remember your preferences and various settings.
- **Security Cookies.** We use Security Cookies for security purposes.

Use of data collected

We use the collected data for various purposes:

- To provide and maintain our Site
- To notify you about changes to our Site and changes in our offering.
- To allow you to participate in interactive features of our Site when you choose to do so.
- To provide customer support.
- To gather analysis or valuable information so that we can improve our Site.
- To monitor the usage of our Site.
- To detect, prevent and address technical issues.
- To improve the in browsing experience on our Site with personalized content.
- Send you information to you regarding changes to our Customer Terms of Service, Privacy Policy (including the Cookie Policy), on our Site
- To provide you with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about, unless you have opted not to receive such information.
- To create lookalike audiences within social networks to enable us to advertise our services, or to create anonymized high-level research on marketing trends

Legal basis for processing of personal data under the GDPR

If you are from the European Economic Area (EEA), TwentyThree's legal basis for collecting and using the personal information described in this Privacy Policy depends on the Personal Data we collect and the specific context in which we collect it.

TwentyThree may process your Personal Data because:

- You have given us permission to do so.
- The processing is in our legitimate interest and have a minimal privacy impact or potential to cause any harm.
- We need to perform a contract with you.
- We are bound by applicable law to do so.

Retention of data

We will retain your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

TwentyThree will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when such data is used to strengthen the security or to improve the functionality of our Site, or we are legally obligated to retain this data for longer time periods.

Transfer of data

Your information, including Personal Data, may be transferred to — and maintained on — computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those under your jurisdiction. If you are located outside the European Union and choose to provide information to us, please note that we transfer the data, including Personal Data, to the European Union and process it there.

Your consent to this Privacy Policy followed by your submission of such information represents your agreement to such transfer.

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. No transfers of your Personal Data will take place to a third organization or across country borders unless there are adequate controls in place ensuring the security of your data and other personal information.

Disclosure of data

Under certain circumstances, TwentyThree may be required to disclose Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

TwentyThree may disclose your Personal Data in the good faith belief that such action is necessary to comply with a legal obligation; to protect and defend the rights or property of TwentyThree; to prevent or investigate possible wrongdoing in connection with the Site; to protect the personal safety of users of the Site or the public; or to protect against legal liability.

Data security

We use a variety of security technologies and procedures to help protect your Personal Information from unauthorized access, use or disclosure. We secure the Personal Information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. All Personal Information is protected using appropriate physical, technical and organizational measures.

Your rights under the GDPR

If you are a resident of the European Economic Area (EEA), you have certain data protection rights. TwentyThree aims to take all reasonable steps to allow you to correct, amend, delete, or limit the use of your Personal Data.

If you wish to be informed of what Personal Data we hold about you and/or if you want it to be removed from our systems, please email rights@twentythree.net.

You hold specific data protection rights under the GDPR:

- You have the rights under the GDPR to access, update or to delete the information we have on you. The procedure of deleting your personal data takes up to 7 working days.
- You have the right to have your information rectified if that information is inaccurate or incomplete. The procedure of getting your personal data takes up to 7 working days.
- You have the right to object to our processing of your Personal Data.
- You have the right to request that we restrict the processing of your personal information.
- You have the right to be provided with a copy of the information we have on you in a structured, machine-readable and commonly used format.
- You also have the right to withdraw your consent at any time where TwentyThree relied on your consent to process your personal information.

Please contact rights@twentythree.net with any requests to exercise these rights.

You have the right to complain to a Data Protection Authority about our collection and use of your Personal Data. For more information, please contact your local data protection authority in the European Economic Area (EEA).

To Unsubscribe From Our Communications

You may unsubscribe from our marketing communications by clicking on the "unsubscribe" link located on the bottom of our emails, updating your communication preferences, or by sending us email us at rights@twentythree.net

Service providers

We employ third party companies to provide services to the Site. We use services to monitor and analyze the use of our Site. We use remarketing services to advertise on third party websites to you after you visited our Site. We and our third-party vendors use cookies to inform, optimize and serve ads based on your past visits to our Site. We use a global content delivery network to optimize delivery of the Site and its content.

These third parties have access to your Personal Data only to perform these tasks on our behalf and are obligated not to disclose or use it for any other purpose.

Links to other sites

Our Site contains links to other sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We have no control over and assume no responsibility for the content, privacy policies or practices of any third party sites or services.

Children's privacy

Our Site does not address anyone under the age of 18 ("Children"). We do not knowingly collect personally identifiable information from anyone under the age of 18. If you are a parent or guardian and you are aware that your Children has provided us with Personal Data, please contact us. If we become aware that we have collected Personal Data from children without verification of parental consent, we take steps to remove that information from our servers.

Further information

We hope that this document has clarified our use of and practises around Personal Data.

If there is anything that you not sure of or that needs further clarification, we highly encourage you to contact us at rights@twentythree.net. This includes questions regarding data compliance and your personal data in relation to TwentyThree.

You can find additional information at <https://www.twentythree.net/policies>.

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