

POP-31	WEBSITE VISITOR PRIVACY NOTICE		
Responsible: AHP, CMO	Effective date: 19-APR-2023	Rev. 1.2	Page 1 of 6
Approved by: 19-APR-2023, CHJ, CEO			

WEBSITE VISITOR PRIVACY NOTICE

Scope

This Privacy Notice covers personal data obtained about visitors from Eupry's website from Eupry's website, social media platforms and other relevant channels of visitors.

1. Eupry is the data controller

Eupry is the data controller of the personal data we process about you. You can find our contact information below.

Eupry ApS
Hejrevej 26, 1.
DK - 2400 Copenhagen
Denmark
CVR: 3053 6665
E-mail: privacy@eupry.com
Telephone: +45 5351 7700

2. The purposes and legal basis

If you visit our website or interact with us on our social media, and you are not a customer and you have not submitted a form on our website (for example to receive a catalogue, white paper, etc.):

- Technical Data such as pixel data, browser type and version, time zone setting and location, browser plug-in types and versions, operating system and platform and other technology on the devices you use to access this website.
- Usage Data such as information about how you use our website, products and services.
- Marketing and Communications Data such as your preferences in receiving marketing from us and our third parties and your communication preferences.

Eupry receives these categories of personal information because functionalities on social media platforms enable Eupry to view the data. Eupry encourages you to read the privacy policy of

POP-31	WEBSITE VISITOR PRIVACY NOTICE		
Responsible: AHP, CMO	Effective date: 19-APR-2023	Rev. 1.2	Page 2 of 6
Approved by: 19-APR-2023, CHJ, CEO			

those social media:

LinkedIn: <https://www.linkedin.com/legal/privacy-policy>

Facebook: <https://www.facebook.com/privacy/explanation>

Google: <https://policies.google.com/privacy>

Eupry processes the categories of personal data listed above for the following purposes:

- To produce statistics about you as a “customer” or “user”
- To send you relevant marketing

Category of data	Purpose	Legal basis
Online identifiers, browsing history and characteristics of your social media platform	To produce statistics about your type	Legitimate interest, cf. GDPR art. 6 (1) (f)**
Online identifiers, browsing history and characteristics of your social media platform	To re-target you with marketing adds	Legitimate interest, cf. GDPR, art. 6 (1) (f)**
Online identifiers, browsing history and characteristics of your social media platform	To target an audience that looks like you with marketing adds	Legitimate interest, cf. GDPR, art. 6 (1) (f)**
Online identifiers, browsing history and characteristics of your social media platform	Using data analytics to improve our website, products/services, marketing, customer relationships and experiences (so-called service tracking)	

* Legitimate interest is to create business intelligence about our customers, their need for support and our ability to provide it. Strictly speaking, this data management is not necessary for us to provide the service under the contract with you, however, in order to grow as a professional and sector-leading company Eupry must learn from experience and the data gathered about it.

POP-31	WEBSITE VISITOR PRIVACY NOTICE		
Responsible: AHP, CMO	Effective date: 19-APR-2023	Rev. 1.2	Page 3 of 6
Approved by: 19-APR-2023, CHJ, CEO			

** Legitimate interest is to provide relevant marketing to professionals who have shown interest in service such as Eupry's. In order to grow, Eupry must be able to carry out meaningful digital marketing efforts towards a relevant audience. In doing so, Eupry is dependent on the services provided to it by social media platforms.

If you have submitted a form on our website (for example to receive a catalogue, white paper, etc.): Please read (read again) our Form Submission Privacy Notice, which contains information for you in addition to the above.

3. Categories of recipients

Eupry discloses your personal data to the following categories of recipients:

In the case data is transferred to third countries out of the EU, this is done with necessary safeguards in place. Among these safeguards is a Transfer Impact Assessment (TIA)

Type of recipient	Country	Ground for transfer in GDPR art. 46
The provider of our CRM system	USA	Commission's Standard Contractual Clauses
The provider of our 1st party cookie Server side tracking solution. The services we use for statistics and aggregate user data	IR, USA	N/A Commission's Standard Contractual Clauses
The services we use for 1st, 2nd and 3rd party cookies Client Side tracking	USA, EU	Commission's Standard Contractual Clauses

POP-31	WEBSITE VISITOR PRIVACY NOTICE		
Responsible: AHP, CMO	Effective date: 19-APR-2023	Rev. 1.2	Page 4 of 6
Approved by: 19-APR-2023, CHJ, CEO			

4. Storage of your personal data

Eupry processes your personal data for the following periods of time:

Purpose	Period
To produce statistics about your purchase and the support provided to it	When we have produced the statistics we delete the data sets behind it. We produce statistics three years back in time.
Send you relevant marketing	As long as you have interaction with Eupry on Eupry's social media platforms or are registered as a "customer" or a "user" in our systems.
Maintain you as a "customer" or a "user"	As long as you are registered as a "customer" or a "user" in our systems + 2 years.
To produce statistics about your type	As long as you have interaction with Eupry on Eupry's platforms.
To target an audience like you with marketing ads	As long as you have interaction with Eupry on Eupry's platforms.
To re-target you with marketing ads	As long as you have interaction with Eupry on Eupry's platforms.

POP-31	WEBSITE VISITOR PRIVACY NOTICE		
Responsible: AHP, CMO	Effective date: 19-APR-2023	Rev. 1.2	Page 5 of 6
Approved by: 19-APR-2023, CHJ, CEO			

5. Your rights

You have rights regarding the personal data Eupry processes about you. Some of the rights only apply, if certain conditions are met. If you want to make use of your rights, please contact Eupry via the information listed above. Upon contact will assess your request and tell you whether it can be accommodated or not. The rights you can choose between are the following:

- Right to be informed (Art. 12, 13, 14)
- Right of access: You have the right to get insights into the personal data Eupry processes about you as well as a copy of the data. (Art. 15)
- Right to correction: You have the right to have incorrect information about you corrected (Art. 16)
- Right to deletion: Under some circumstances, you have the right to have personal data about you deleted before the termination of the storage period as defined above has come. (Art. 17)
- Right to restriction of the processing: Under some circumstances, you have the right to have the processing of your personal data restricted. (Art. 18)
- Right to object: Under some circumstances, you have the right to object. This also goes for the information Eupry processes about you for the purpose of direct marketing.
- Right to data portability: Under some circumstances you have the right to receive data you have provided to the controller in a structured, commonly used and machine-readable format. (Art. 20)
- Right to object to processing (Art. 21)
- Right to not be subject to automated decision-making (Art. 22)

6. Security Measures

Personal data is stored and maintained in software systems with access control granted to a restricted set of people. Eupry performs Risk assessments & Transfer impact assessments on relevant vendors revised yearly.

POP-31	WEBSITE VISITOR PRIVACY NOTICE		
Responsible: AHP, CMO	Effective date: 19-APR-2023	Rev. 1.2	Page 6 of 6
Approved by: 19-APR-2023, CHJ, CEO			

7. The Danish Data Protection Authority

Eupry is a Danish company. Therefore, you have the right to file a complaint about Eupry's processing of your personal data to the Danish Data Protection Authority. For more information about this, please visit the authority's website:

<https://www.datatilsynet.dk/generelt-om-databeskyttelse/klage-til-datatilsynet/>

8. Contact

All questions, comments and requests regarding this Privacy Notice should be addressed to Privacy@eupry.com

Change history

Revision	Author	Date	Change
1.0	AHP	25-MAY-2022	First version
1.1	AJA	09-DEC-2022	Existing policy document updated to QMS format
1.2	AHP	09-FEB-2023	Original Privacy policy document cleaned for content related to Customers and Users and updated.