

# **Privacy Policy**

### For **The Tabellae Group**

re.

processing of personal data





DOCUMENT PROPERTIES	
Title	Privacy Policy
Company	Tabellae A/S
Approved by	Stefan Reina
Version	2.5
Date of the last update	02/02/2023
Number of pages	15



### Contents

1.	Privac	Privacy policy4			
2.	The services we provide				
3.	What is personal data?				
4.	Tabellae collect data in several ways				
5.	Tabell	ae use your data in several ways	6		
;	5.1. C	ollecting and using data for specific purposes	6		
	5.1.1.	First category	6		
	5.1.2.	Second category	7		
	5.1.3.	Third category	8		
,	5.2. D	eletion of data when it is no longer needed	8		
;	5.3. R	egularly checking and updating data	8		
,	5.4. D	isclose and sharing data	8		
	5.4.1.	If necessary	9		
	5.4.2.	If you have given your consent	9		
	5.4.3.	If required by law, or to protect ourselves, a partner or a third-party	9		
	5.4.4.	Our use of data processors, both inside and outside the EU	9		
6.	You have rights		10		
	6.1.	Right to have incorrect personal data corrected	10		
	6.2.	Right to access your personal data and to obtain a copy of it	10		
	6.3.	Right to deletion of your personal data	11		
	6.4.	Right to demand the restriction of processing	11		
	6.5.	Right to object to processing	11		
	6.6.	Right to revoke consent	11		
	6.7.	Right to demand information on transfer to the outside of the EU	11		
	6.8.	Right to not be profiled or subject to automated decisions	11		
7.	Comp	laint	12		
8.	Children		13		
9.	How c	How do we keep your personal data?			
	9.1.	Internal rules, guidelines, and security procedures	13		
	9.2.	Risk and exemption of liability	13		
	9.3.	Information	14		
10	Links to other service providers		14		
11	Contact details14				
12	. Upo	ating this Privacy Policy	15		
Do	cument nam	e Document date	Pag		



# 1. Privacy policy

Thank you for visiting our website.

Tabellae views the task of protecting and respecting your privacy as one of the utmost essential activities when Tabellae services you choose to use our services.

We emphasize a high priority on data security and confidentiality, which is why one of our core objectives is to process your data appropriately and adequately so you can feel comfortable using our services.

We maintain the highest ethical standards by following the legal rules set by our national (Denmark) and regional (EU) and going beyond that by setting strict internal procedures to ensure that we process your data in the best possible way,

Tabellae Privacy Policy gives the reader a full description of how the data is processed, which rights are entitled to the user in connection with using our website, products, and other services.

Should you have any questions or comments regarding the privacy policy – or you wish to get in touch with us,

If you have questions or comments about our privacy policy or want to get in touch, please contact us. Click here to see our contact details.



### 2. The services we provide

Our companies have particular expertise in delivering, implementing, and optimizing Lasernet Input & Output Management software.

The Tabellae Group is an implementing consultancy and knowledge house, which works with the most ambitious companies that want to:

- Reduce the cost of document exchange, document management, and maintenance.
- Automate processes concerning document input and output management.
- Comply with national, regional, and global legal rules.

For these purposes, Tabellae collects a variety of data about you and your company.

Tabellae also elaborates its gathering, usage, purpose, protection, location collection, and user rights description on several locations throughout the <u>company website</u>, <u>LinkedIn</u>, and other locations.

# 3. What is personal data?

Personal data can be many things.

It may be a name, address, and telephone number. It may also be an image or an IP address.

Personal data is any information that can be used to identify a person. Therefore, one individual piece of information on its own may not necessarily be considered personal data.

If several personal data pieces cannot separately identify a person, collectively, they can. This collective set of data will then be considered personal data.



# 4. Tabellae collect data in several ways

We collect personal data about you in the following ways:

- When you use our website
- When you buy our products
- When you connect with Tabellae Customer Service/Support
- When you sign up for the Tabellae newsletter
- · When you provide personal data yourself

On the next page, you can read the description of the reason for personal data usage.

# 5. Tabellae use your data in several ways

We use your personal data in the following ways:

- Collecting and using data for specific purposes
- Deletion of data when it is no longer needed
- · Regularly checking and updating data
- Disclose and sharing data

### 5.1. Collecting and using data for specific purposes

The purpose of collecting and using your data can be divided into categories:

#### 5.1.1. First category

This category contains specific personal data. Tabellae needs to know certain aspects about you to provide its services to you. Data examples in this category could be your name, phone number, and e-mail address, i.e., necessary data for identification and contact.

That constitutes our legal basis for processing. If Tabellae cannot process this personal data, services, products, and other offerings cannot be provided to you.

We may also have another basis for processing, e.g., by law, we are obligated to record and store specific personal data. This form of personal data is needed for achieving compliance with legislation(s) regarding taxes, accounting e.g.



Should Tabellae require data usage to cover different purposes than the main reasons it is collected, we will inform you. Should the frame of the original purpose exceed you will be informed of this. Tabellae will communicate such deviations before any actions are taking and kindly explain the reasons.

#### 5.1.2. Second category

This category contains data collecting during visits to our site and pages. Tabellae can collect IP addresses and place cookies on your computer. The necessity of these measures is to ensure that our website and pages are working correctly.

None of the data in this category is strictly necessary to provide our service to you. Therefore, you and other users must give your explicit consent to Tabellae so that we may collect and use the data.

In this regard, our processing basis is your consent.

Your consent is voluntary. Should you accept and give us your consent, you have the right to revoke the consent at any given time. You can contact us, either in the <u>contact details</u> at the bottom of this document or by visiting our <u>website</u>.

Your consent is voluntary and if you have given it to us, you can withdraw it at any time by contacting us at the contact details at the bottom of our privacy policy.

By consenting to receiving e-mails from us a Marketing Form is sent. In this there are two different levels of consent: Consent Level 2 or 5. The two levels of consent are described as follows by Microsoft:

- Consent level 2:
  - The individual consents to be sent transactional messages that relate to specific, existing business between the two parties. These messages can't include marketing or promotional content. Examples include bank statements, order receipts, and membership status messages.
- Consent level 5:
  - The individual allows the organization to use demographic and behavior information (such as website visits, email opens, and email clicks) for automated decision making. It is the organization's responsibility to classify which of their processing activities fall under the category of automated decision making. Examples include automatic calculation of credit limits or loan promises based on available data, and calculation mechanics using rule-based or predictive calculations. Children shall never be subject to such profiling and automated decision making.

Should Tabellae find relevant products and services similar to earlier purchases, we reserve the right to contact and offer them to you, according to applicable Danish law.

The above approach applies whether Tabellae received an e-mail address upon purchase or got the explicit user consent given at any time.

When Tabellae engages with a customer with such offers, there will always be an option to decline from receiving similar inquiries in the future.



Should Tabellae require data usage to cover different purposes than the main reasons it is collected, we will inform you. Should the frame of the original purpose exceed you will be informed of this. Tabellae will communicate such deviations before any actions are taking and kindly explain the reasons.

#### 5.1.3. Third category

This category contains the specific personal data stored by Tabellae to ensure the correct representation of Tabellae interest in the future, should the need arise. The legal basis for Tabellae processing is defined as our company's 'legitimate interests', as these are understood in applicable personal data legislation.

Among other things, this means that we store data for a given period of time based on an individual assessment. The period and the extent of the personal data subjected to this processing is determined based on the criteria in the next section 'We will delete your personal data when it is no longer needed.'

#### 5.2. Deletion of data when it is no longer needed

Tabellae regularly estimates when data is no longer needed. According to the purposes described above in point <u>5.1</u>, when we no longer need the personal data, we will delete them.

The Tabellae Group might be required by law to keep personal data for an extended period. For example, Tabellae is required by the governing law - under the <u>Danish Bookkeeping Act</u> - to store some personal data for a minimum of five years.

This data could be personal data to issue invoices, settle tax and VAT correctly, and document it correctly to the authorities.

### 5.3. Regularly checking and updating data

Tabellae continuously monitors your personal data, which we process to ensure that it is not erroneous or misleading.

This continuous monitoring is ensured through our established internal guidelines for verifying the correctness of the data. You may use the <u>contact information</u> at the bottom to inform us of changes.

### 5.4. Disclose and sharing data

We do not sell, publish, or disclose your personal information to others unless:

- It is necessary to provide our service to you.
- It is necessary to comply with the law.
- You have given us your consent to do so.



- It is necessary to protect a partner or a third-party. Note that there are strict rules in the legislation about disclosing personal data on this basis.
- It is part of Tabellae use of data processors, both in and outside the EU.

#### 5.4.1. If necessary

We cooperate with selected and trusted partners to deliver our services to you, including companies within our group and data processors.

To these, we disclose the personal data necessary for us to provide our overall service(s) to you.

#### 5.4.2. If you have given your consent

We disclose personal data to companies, organizations, or individuals outside of our company and group if we have your consent to do so.

Your consent and thus the disclosure to our partners means, among other things, that our partners may contact you for sales and marketing purposes.

You may object to such disclosure at any time.

If relevant, you can also opt-out of being contacted for marketing purposes in the CPR register (for Danish customers/visitors.).

#### 5.4.3. If required by law, or to protect ourselves, a partner or a third-party

In some instances, the law allows us to disclose personal information without your consent. In rare circumstances, Tabellae could be *required* to do so or even *allowed to* do so.

To the extent the law permits, we may disclose personal data to protect or enforce our rights. The same applies to rights that belong to our partners and third parties.

For example, Tabellae could be required to reveal data to prevent fraud or other crimes.

#### 5.4.4. Our use of data processors, both inside and outside the EU

We obtain your consent before disclosing your data to partners in third countries unless they act as our data processors. A third country may be, e.g., certain African countries.

If we disclose your data to third countries, we first ensure that their data protection level lives up to the high-standard requirements, Tabellae has set in this policy and the following requirements we are subjected to through the law.



# 6. You have rights

In this section, you can read about some rights you have regarding our processing of your data, among other things:

- Right to have incorrect personal data corrected
- · Right to access your data and to obtain a copy of it
- Right to delete your personal data
- Right to demand restriction(s)
- Right to object to processing
- · Right to revoke consent
- · Right to demand information on transfer to the outside of the EU
- Right to not be profiled
- Right to complain about our processing of your personal data

To learn more about your rights, please contact us via the contact information at the bottom.

#### 6.1. Right to have incorrect personal data corrected

We verify that the personal data we process about you are not erroneous or misleading. We do this by comparing your personal data against public records. You have the right to correct your personal data possessed by us.

#### 6.2. Right to access your personal data and to obtain a copy of it

You have the right to access the personal data we hold about you and to obtain a copy of said personal data at any time.

You can also be informed of:

- · The purposes of the processing
- How long we store your personal data for
- Whether we make automated decisions (including profiling)
- Who we disclose personal data to
- Where Tabellae gained the personal data.

However, this does not apply if you are already familiar with the personal data.

Note that we point out that the right of access may be limited for the protection of other people's personal data and our trade secrets.



#### 6.3. Right to deletion of your personal data

You may request the deletion of your personal data in our possession at any time.

If we no longer have a reason to hold your personal data, we will delete them as soon as possible upon your request.

#### 6.4. Right to demand the restriction of processing

You have the right to ask us to restrict the processing of your personal data at any time.

#### 6.5. Right to object to processing

You have the right to object to our processing of your personal data at any time.

That also includes the right to object to our use of personal data for marketing purposes. If you object, we will consider it as soon as possible.

#### 6.6. Right to revoke consent

You may withdraw the consent you have given to us at any time.

#### 6.7. Right to demand information on transfer to the outside of the EU

You are entitled to know whether we transfer personal data to a country outside of the EU.

We can inform you that we transfer personal data to IT companies that act as our data processors in the United States.

All of our data processors in the United States are committed to complying with applicable privacy legislation or have signed an EU standard contractual clause.

We can therefore transfer personal data to these companies.

#### 6.8. Right to not be profiled or subject to automated decisions

You have the right to forbid Tabellae to make profiles of you and your personal data or forbid us from making automatic decisions.

We can confirm that our company does not engage in profiling or automated decision making.



### 7. Complaint

Tabellae does everything within its capabilities to ensure that your personal data is processed safely and that your rights are protected optimally.

We regularly review our procedures and the processing of personal data.

Should you, contrary to expectation, believe that we do not process your complaint and respect your rights under the law, we ask you to contact us, preferably by e-mail, noting "complaint" in the subject field. You can write to us at info@tabellae.com.

We will then refer your complaint to a senior employee in our company so that any misunderstandings and misconceptions can be cleared up.

If you continue to believe that we do not process your complaint and respect your rights under the law, you can complain to the relevant Data Protection Agency via:

#### The Danish Data Protection Agency

Borgergade 28

DK-1300 Copenhagen K Tel.: +45 33 19 32 00

www.datatilsynet.dk

#### The Swedish Data Protection Agency

Drottninggatan 29, plan 5 SE-111 51 Stockholm Tel.: +46 08-657 61 00 www.datainspektionen.se

The Norwegian Data Protection Agency

NO-Postboks 458 Sentrum 0105 Oslo

Tel.: +47 22 39 69 00 www.datatilsynet.no



### 8. Children

Our company is aimed at adults. We do not knowingly collect personal information from or about children.

We are realistic about the risk of children's use of electronic devices, preventing us from having complete certainty about never receiving personal data about children.

We have tried to design our systems as best as possible to avoid receiving personal data from children. We immediately delete personal data if we become aware that we have inadvertently received personal data from children.

Suppose you are a parent or guardian and think that your child has provided us with personal information, consciously or unconsciously. In that case, we ask you to contact us as soon as possible via our contact details stated at the bottom.

# 9. How do we keep your personal data?

We are committed to protecting your privacy. The protection is both a result of legislation and our internal code of ethics requiring us to take good care of your personal data.

We use appropriate and sound technical and organizational security measures to ensure that no unauthorized access is granted to our database. The aim of this is to ensure that personal data is not used, destroyed, altered, published, or otherwise abused.

In this section, you can read about our general rules and practices.

- We have internal rules for the security of information in connection with personal data
- · User behavior is crucial to ensuring an adequate level of security
- We will inform the persons concerned in the event of a risk or an actual data breach

#### 9.1. Internal rules, guidelines, and security procedures

These stipulate that personal data are only available to the employee(s) who needs it.

Employees who process personal data have signed a confidentiality agreement.

#### 9.2. Risk and exemption of liability

The greatest danger of abuse of personal data is a result of people's behavior.

It is up to each person to protect their data (including never disclosing passwords to others), just as it is up to our company to account for human intervention.



Although we have taken the above actions to reduce risks when processing personal data, this may not constitute 100% certainty that there will be no unintended events.

Therefore, we exclude any losses due to unintended events related to our use and processing of your data to the extent that we can do so under applicable law.

Tabellae cannot be held responsible for losses of any kind related to the use of our company, our products and services, our website, systems, applications, and other software to the extent that we can waive such liability under applicable law.

We recommend that you take action to safeguard your data.

You can do this by i.a. shutting down your browser after use, logging out of all accounts after use, installing antivirus, anti-malware, and other software to enhance the security on your computer.

We recommend that you regularly update the software, the apps you use, your computer and mobile devices and never disclose your password to others.

#### 9.3. Information

As mentioned, we have implemented several initiatives to safeguard your personal data processing.

Should our IT systems and other security measures still be compromised, we will notify you without delay if the compromise poses a high risk to your rights and freedoms.

### 10. Links to other service providers

There may be links to other websites that do not belong to our company or our group on our website.

We are not responsible for these websites' content, and our Privacy Policy does not apply to these companies' websites.

### 11. Contact details

The Tabellae Group consists of Tabellae A/S and its subsidiaries. The Tabellae Group is the data controller and ensures that your data are processed under the law:

#### Tabellae A/S

Søndre Ringvej 41, 1. sal, 2605 Brøndby

Company reg. no. (CVR).: 33081502 Tel.: +45 5354 5557 E-mail: info@tabellae.com Website: www.tabellae.com



#### **Tabellae AB**

Org.nr. SE559006399501 Grenadjärgatan 8

SE - 254 53 Helsingborg Tel.: +46 (0)42 611 50 30

#### **Tabellae AS**

Org.nr.: 917526729MVA Jonas Lies gate 5 NO – 2000 Lillestrøm Tel.: +47 457 92 659

#### (Tabellae A/S) TBL,

Rua Mouzinho da Silveira, nº 10, 2nd floor, PO - 1250-008 Lisboa

#### **Tabellae Deutschland GmbH**

Alter Kirchenweg 85 24983 Handewitt Deutschland

#### Tabellae, Inc.

20 W Kinzie St Floor 17 Chicago, IL 60654 Tel.: +1 (908) 200-7937

# 12. Updating this Privacy Policy

We update our Privacy Policy when we believe it is necessary. This could be when we offer new services and products. We reserve the right to change this Privacy Policy if significant changes are made through legislation, new technical solutions, or to improve the website.