

# Privacy Policy

For The Tabellae Group

re.

processing of personal data



**DOCUMENT PROPERTIES**

**Title** Privacy Policy

**Company** Tabellae A/S

**Approved by** Stefan Reina

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# 1. Privacy policy

This policy regards the collection and processing of personal data and describes how Tabellae A/S and subsidiaries process personal data.

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

We prioritize data security and confidentiality, making it our core objective to process your data properly and securely so that you can feel confident using our services.

We uphold the highest ethical standards by complying with national (Denmark) and regional (EU) regulations and going beyond them with strict internal procedures to ensure the best possible processing of your data.

Tabellae's Privacy Policy describes how data is processed and outlines the rights users are entitled to when using our website, products, and other services.

Our Privacy Policy fulfills our duty to inform you, as a data subject, about our processing of your personal data in accordance with Articles 13 and 14 of Regulation (EU) 2016/679 (GDPR).

If you have any questions or comments about our Privacy Policy or wish to get in touch, please contact us (information in section 11).

If you want more information about our Cookie Policy, you can find it [here](#).

## 2. The services we provide

Our companies have a particular expertise in delivering, implementing, and optimizing the Lasernetet 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 [company website](#), [LinkedIn](#), 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, e.g. by using cookies
- When you buy our products
- When you connect with Tabellae Customer Service/Support
- When you sign up for the Tabellae newsletter or seminars
- When you provide personal data yourself

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

The personal data we process will normally be of non-sensitive nature. This may include e.g., username, email address, name, job position, company name or phone number. We may also use technologies to determine if you have opened an e-mail or clicked on a link contained in an e-mail.

## 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 of you to provide the 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.

This 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, such as a legal obligation to record and store specific personal data. This type of personal data is necessary to ensure compliance with legislation regarding taxes, accounting, and similar requirements.

If Tabellae needs to use data for purposes other than the main reasons for which it was collected, we will inform you. If the scope of the original purpose is exceeded, you will be notified. Tabellae will communicate any such deviations before taking any action and will explain the reasons.

### 5.1.2. Second category

This category contains data collecting during visits to our website. Tabellae can collect IP addresses and place cookies on your computer. The necessity of these measures is to ensure that our website and pages work correctly. We use [Fathom](#) to analyze the performance of our websites and follow up on the effectiveness of our marketing efforts.

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 basis for processing 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 [contact details](#) at the bottom of this document or by visiting our [website](#).

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 like 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.

If you participate in a Tabellae event, we may direct you to the website of our event registration vendor or collect personal data for registration, which you provide when registering for the event. In that case, the information you enter in the form will be shared with us for managing and following up on the event. You will also have the option to opt in to the Tabellae newsletter or other marketing communications.

### 5.1.3. Third category

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

Among other things, this means that we store data for a specific period based on an individual assessment, which is made in accordance with GDPR Article 5 on data minimization. The duration and extent of the personal data subject to this processing are determined based on the criteria outlined 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 assesses when data is no longer needed in accordance with the internal 'Deletion Policy.' As outlined in point 5.1, when we no longer need the personal data for the purposes described above, we will delete it.

In general, Tabellae retains your personal information for no more than 12 months (1 year) after the last contact or when the contract has expired, except for information that must be kept for legal reasons

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 [Danish Bookkeeping Act](#) - 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 that we process to ensure it is not erroneous or misleading. This monitoring is carried out in accordance with our established internal guidelines for verifying the accuracy of the data. You may use the contact information at the bottom to inform us of any changes.

## 5.4. Disclose and data sharing

We do not sell, publish, or disclose personal information to others, with a few exceptions:

- 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. Some are based outside the European Union. We hold all trusted partners, vendors, and companies within the Tabellae Group to the same high standards as we hold ourselves to.

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

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

Your consent, and thus the disclosure of your data to our partners, means 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 include, for example, certain Asian countries. If we disclose your data to third countries, we ensure that their data protection standards meet the high-level requirements set by Tabellae and the legal requirements to which we are subject.

When transferring data within the Tabellae Group, Tabellae has an intra-group agreement (which also includes and is based on Standard Contractual Clauses, SCC) to ensure compliance with all GDPR laws. Tabellae may share personal data within the Tabellae Group and transfer it to countries where we do business, in connection with the purposes identified above and in accordance with this Privacy Policy.

We may transfer your personal data to “third countries” outside the EU/EEA, including the United States and Philippines. Such transfers are based on either the standard contractual clauses of the European Commission (SCC) and adequacy decisions from the European Commission or another applicable legal basis for such transfer.

## **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

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

We verify that the personal data we process about you is not erroneous or misleading. We do this by comparing your personal data to 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
- For how long Tabellae stores your personal data
- Whether we make automated decisions (including profiling)
- Who we disclose personal data to
- Where Tabellae gained personal data.

However, this does not apply if you are already familiar with the 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. This also includes the right to object to our use of personal data for marketing purposes. If you object, we will consider the objection 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 may transfer personal data to IT companies that act as our data processors in the United States and the Philippines.

All our data processors are committed to complying with applicable privacy legislation or have signed an EU standard contractual clause (SCC).

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

You have the right to forbid Tabellae from making 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 takes all necessary measures to ensure that your personal data is processed securely and that your rights are optimally protected.

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

Should you, contrary to expectations, believe that we have not processed your complaint or respected your rights under the law, we kindly ask you to contact us, preferably by e-mail, with 'Complaint' in the subject line. You can reach us at [info@tabellae.com](mailto:info@tabellae.com).

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**

Carl Jacobsens Vej 35  
2500 Valby  
Tel.: +45 33 19 32 00  
[www.datatilsynet.dk](http://www.datatilsynet.dk)

### **The Swedish Data Protection Agency**

Fleminggatan 14, 112 26 Stockholm

Sweden

Tel.: +46 08-657 61 00

[IMY@IMY.se](mailto:IMY@IMY.se)

[www.datainspektionen.se](http://www.datainspektionen.se)

### **The Norwegian Data Protection Agency**

NO-Postboks 458 Sentrum

0105 Oslo

Tel.: +47 22 39 69 00

[www.datatilsynet.no](http://www.datatilsynet.no)

### **The German Federal Commissioner for Data Protection and Freedom of Information (BfDI)**

Graurheindorfer Straße 153

53117 Bonn

Telephone: +49(0)228 997799-0

E-mail: [poststelle@bfdi.bund.de](mailto:poststelle@bfdi.bund.de)

[www.bfdi.bund.de](http://www.bfdi.bund.de)

### **Portuguese Data Protection Agency**

Av. D. Carlos I, 134, 1º

1200-651 Lisboa

T (+351) 213 928 400

[geral@cnpd.pt](mailto:geral@cnpd.pt)

<https://www.cnpd.pt/>

## **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 people concerned about the possibility of a risk or an actual data breach.

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

We have internal guidelines, policies, and procedures to ensure compliance. These for example stipulate that personal data is only available to the employee(s) who need it, and that 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 many measures and 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.e. 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 is 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](mailto:info@tabellae.com) Website: [www.tabellae.com](http://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  
Brogata 7, NO – 2000 Lillestrøm  
Tel.: +47 457 92 659

### **(Tabellae A/S) TBL Unipessoal, Lda.**

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

### **Tabellae Deutschland GmbH**

Alter Kirchenweg 85  
24983 Handewitt Deutschland

### **Tabellae, Inc.**

515 N. State Street, 14th Floor  
Chicago, IL 60654  
Tel.: +1 (908) 200-7937

### **Tabellae Asia, Inc.**

8<sup>th</sup> floor Marajo Tower, 312 26<sup>th</sup> Street West Corner, 4<sup>th</sup> Avenue, Bonifacio Global City, Taguig City, National Capital Region, 1634, Philippines

## 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.