

## Privacy Policy

Applicable until 1.5.2025 for existing clients of Cobuilder platform.

Cobuilder International, from now on referred as “Cobuilder” understands that your privacy is important. To better protect your privacy Cobuilder provides this Privacy Policy explaining our information collection and processing practices and the choices you can make about the way your personal information (as defined below) is collected and used. This Privacy Policy governs the processing of your personal information.

This Privacy Policy shall be interpreted in connection with the Terms of Service. This Privacy Policy is an integral part of the Terms of Service.

When we refer to “Cobuilder”, we mean the Cobuilder entity that acts as the controller or processor of your information. The entity “Cobuilder” includes a variety of products and services, as well as it provides training in association with using Cobuilder’s products and services. This Privacy Policy applies to all products and services, developed and governed by Cobuilder.

## What data we collect?

Cobuilder only collects personal information that you provide to us and personal information on how you use Cobuilder web-based products and services (online or offline), at our web sites such as [www.cobuilder.com](http://www.cobuilder.com) and other applicable web sites (referred separately and jointly as ‘Cobuilder Online Services’). ‘Personal information’ shall mean any information on you from which you are identifiable to Cobuilder or a third party. You are generally free to provide only such personal information that you determine. However, certain offerings as well as using Cobuilder Online Services will require that you provide specific data (e.g. for registering as an user, receiving online support as well as further educational materials).

In order to identify you, Cobuilder collects the following types of personal data from you, some of which you may be required to provide during your sessions on Cobuilder’s websites or in Cobuilder Online Services:

<b>Data</b>	<b>Functional Data Category</b>
Personal Name;	Identification data
Company Name;	Identification data
Job Title	Identification data
Corporate E-mail Address;	Identification data
Corporate Phone Number;	Identification data

Contact Information (Corporate Address including: Country, City, Zip Code, Street Address )	Identification data
Geographical Location	Identification data
IP Address	Identification data

## Purpose of data processing

The provision of personal data is voluntary, however it is necessary in order to conclude a contract with Cobuilder. If you refuse to provide Cobuilder with any “Identification data” from the above, Cobuilder will not be able to provide you access to any of Cobuilder Online Services.

We are processing your personal data for the purpose of:

- manual conducting of contract for using Cobuilder Online Services;
- automated creation of your personal account for getting access to Cobuilder Online Services;
- manual and automated communications and messages sent over e-mail or provided to you by phone;
- automated and manual processing of browsing habits in order to improve Cobuilder Online Services and to determine what additional features or services/products will be suitable for you.

## How we use and how we are processing your data

Cobuilder is using your data to create your personal and corporate account. The purpose of the account is to provide you access to Cobuilder Online Services. As the access is subject to a contract with your organisation of employment, and restricted to specific individuals, Cobuilder needs your Identification Data in order to be able to authenticate you and to grant you access and authorization to use our products/services.

Cobuilder is striving to provide you better experience with Cobuilder Online Services. Due to that reason, Cobuilder is collecting and analysing your browsing habits on all Cobuilder websites and Online Services. The main purpose of that processing is to create and to improve graphic user interfaces (GUI) of Cobuilder websites and Online Services in respect to the user-friendly manner (to be more intuitive, and easier to use). Based on the collected information of your browsing habits, Cobuilder may identify and offer you additional modules, services, online and offline training, support materials, downloadable e-books, participation in various online and offline events, which will improve your experience and will bring value to you and your organisation of employment.

## How long we store your data

As a data controller for the purposes outlined in this Privacy Policy Cobuilder keeps and processes personal data for no longer than is necessary for the specific purposes identified in this Privacy Policy. Cobuilder is required to retain your personal data for a longer period of time in order to comply with legal obligations, resolve disputes, and enforce our legal agreements and policies with our customers

We will retain your information for as long as your account is active or as needed to provide you with Cobuilder products and services. In order to support you even in cases outside of the contract agreement period, we will retain and use your information as necessary to comply with our legal obligations, resolve disputes, and enforce our agreements and policies with our customers.

Our retention period policy will vary (policy stays the same, period varies) depending on the type of data, the purpose and the legal requirements for processing.

CoBuilder will keep personal data in the following cases:

- When the data subject gave us consent for processing his or her personal data
- When the processing is necessary for the performance of a contract
- When there are legitimate interest, a legal and/or contractual requirements to hold personal data
- When the personal data is necessary for our systems to operate

## **Consent Withdrawal and personal data**

All Cobuilder e-mail communications and messages contain a link "Update Subscription Preferences". If you wish to stop receiving communication from Cobuilder, you will be able to declare your wish by following the link and changing your preferences.

Should you believe that any personal data Cobuilder holds on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted by considering the implications described above. Please contact us at [support@cobuilder.no](mailto:support@cobuilder.no).

In the event that you wish to complain about how Cobuilder has handled your personal data, please contact Cobuilder at [support@cobuilder.no](mailto:support@cobuilder.no). Our Client Services experts will then look into your complaint and work with you to resolve the matter.

If you still feel that your personal data has not been handled appropriately according to the law, you can contact Data Protection Authority and file a complaint with them.

## **The legal grounds we have to use your personal information**

As an online publisher, Cobuilder depends on applying their business model through all means provided by the web. Any digitally enabled individual, by being active on the web, is leaving behind digital traces. Those digital traces create an amount of valuable information, which companies might rely upon, in order to reach their target audience more efficiently and in result accomplish their business goals and run their business in a

beneficial way. Cobuilder collects only the personal information necessary to provide you our services and to fulfil your request. Where additional, optional information is sought, you will be notified of this at the point of collection.

As a Controller the EU 2016 regulation allows us to process personal information and provide us legal ground under the law to do so. The regulation requires Cobuilder to inform and notify every data subject what those grounds are.

As a result, when we process your personal information, we will rely on one of the following processing conditions:

- **Performance of a contract:** in most of the cases all our customers have signed contract for using our online services. In order to perform our obligations under a contract we are collecting, processing and storing subject's data as per the Terms and Conditions for the respective service.
- **Legitimate interests:** we are processing information about you as a lawful ground legitimate interest for direct marketing, product development and enhancement, communications and intelligence gathering; or
- **Consent:** in some cases, we will ask you for specific permission to process some of your personal information, and we will only process your personal information in this way if you agree to us doing so. You may withdraw your consent at any time by contacting Cobuilder at [DPO@cobuilder.com](mailto:DPO@cobuilder.com).
- **Legal obligation:** we are required to process your personal information in order to comply with a legal obligation, such as keeping records for exposure register for customers.

Examples of the 'legitimate interests' referred to above are:

- To offer information and/or services to customers who visit our web site;
- To send information for new system functionalities, newsletters, trainings and conferences;
- Fraud and financial crime detection and prevention;
- Information systems protection and cyber security;
- Product development and improvements;
- To customize customers' online experience and improve the performance, usability and effectiveness of Cobuilder's online presence;
- To conduct, and to analyse, our marketing activities;

## Disclosing of personal data

Cobuilder is not sharing your personal data to any third party, unless lawfully required or specifically required in order to provide you with the services subject to the contract you or your organisation of employment has signed with Cobuilder.

It's possible to disclose your information and we will permit that activities only in the following circumstances:

- crime prevention, investigation and legal proceedings
- requests from police forces
- requests from other law enforcement agencies

Note: before Cobuilder discloses personal data in response to such a request, Cobuilder will check that the request is genuine.

## How we secure your data

Your personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures ('confidentiality, integrity and availability').

In order to provide high level of security for your personal data Cobuilder follow and keep compliance with the standard guidelines for information security provided by ISO 27001: 2013.

Cobuilder may share some of your Identification Data or other information associated with your projects with other companies such as product manufacturers, so that they can contact you with details of products or services you may be interested in and where the companies agree to use your information for that purpose only.

If you have agreed to receive information about products and services from another company and later decide not to, you will need to contact that company yourself to let them know. You can at any time ask us not to continue to provide your information to other companies in future by sending a request to [support@cobuilder.no](mailto:support@cobuilder.no)

In certain areas of Cobuilder Online Services, your contact information will be searchable and viewable by anyone that accesses the Cobuilder Online Services. Cobuilder may also makes other personal information public but only by getting your consent. Cobuilder may also use or publish de-personalized information and statistics of Cobuilder users on an anonymous basis.

When you interact with Cobuilder Online Services, all the data exchanged between you and the Cobuilder Online Services will be transferred only to and from the Cobuilder data servers hosted in Microsoft Azure West Europe data centers in Amsterdam. Accordingly, by using the Cobuilder Online Services, you consent to the transfer of your personal data to these locations.

You consent that Cobuilder may, from time to time, share your personal information within Cobuilder, which may mean transferring the personal information within the European Economic Area and elsewhere. Cobuilder will ensure that any such personal information transferred is appropriately protected and, where required, made pursuant to a contract or other measure providing adequate protection.

Credit card information is not stored on our server in any form and under any circumstances.

You can refuse to give us personal information.

For certain areas of Cobuilder Online Services, Cobuilder requests registration information from you, and you are free to provide this personal information or deny the request. If you do not provide the requested personal information, you will not be able to access all of the Cobuilder Online Services.

Cobuilder is committed to ensure restricted access to your personal information.

In certain circumstances, Cobuilder may provide your information to third parties when we reasonably believe that we are required to do so by law. Additionally, you consent that Cobuilder may provide your personal information to certain business partners or service providers of Cobuilder in the course of providing you with information, products or services. It is Cobuilder's policy to never sell your information to list brokers or agents for commercial gain.

Cobuilder will use the personal information that you provide to ensure better experience in respect to Cobuilder Online Services. Cobuilder may also notify you on updates of Cobuilder Online Services and of special events or new product offerings that Cobuilder or its business partners may introduce. These notifications and marketing may be in the form of e-mails or phone calls. Cobuilder permits you to opt out from receiving such notices or marketing if you so request by following the guideline of changing preferences described above.

You can change and correct your personal information any time by following the guideline of updating your preferences, described above or contacting Cobuilder at [support@cobuilder.no](mailto:support@cobuilder.no).

If you are a registered user, you may access the personal information that has been recorded on the Cobuilder websites and Online Services and update or correct your personal by logging in to your account. You also have a right to request Cobuilder to remove your personal data. Such request to remove personal information may cause termination of your account.

## **Browsing Habits**

Cobuilder utilises cookies and other tracking technologies to make Cobuilder Online Services more intuitive, user-friendly and to provide enhanced and customised features during your visits and sessions on Cobuilder websites and Online Services. Cookies and other tracking technologies are used in all Cobuilder Online Services for the purposes of recognising you, your country and language preferences and track your use of Cobuilder Online Services. If you have a registered account, Cobuilder uses cookies to recognise you and to pre-fill forms to save your time. Cobuilder does not mandate cookies for you to access Cobuilder Online Services, and should you not want the Cookies to be used when you use Cobuilder Online Services, you may freely set your browser to reject all cookies or to prompt you to accept or reject them.

In order to improve the content of Cobuilder Online Services, Cobuilder tracks the amount of time you spend browsing the Cobuilder websites and Online Services, the pages you visited, and the Uniform Resource Locator (URL) click streams you use when navigating through the Cobuilder Online Services. Cobuilder Online Services does

recognise your domain name and may collect your MAC address, IP address or other persistent / non-persistent identifier and information on your operating system in connection with your use of Cobuilder Online Services. Cobuilder also collects information on how you interact with Cobuilder Online Services.

## **Illegal use of Cobuilder software**

Cobuilder regards software piracy (as defined in the applicable laws) as criminal offense, and we view offenders accordingly. We do not tolerate illegal copies, usage and distribution of Cobuilder Online Services, and we pursue those who do so (both civilly and criminally) using all legal means available, including public and private surveillance resources. As part of these efforts, Cobuilder utilises data monitoring and sourcing technologies to the maximum extent permitted by applicable laws to obtain and transmit data on the users of illegal copies of our software.

## **Protection of information**

Cobuilder will take reasonable steps necessary to protect the information you provide to us. We continually review our security procedures and mechanisms to ensure that adequate protections are in place. Cobuilder reserves the right to make amendments to this and other policies, subject to international personal data protection legislation, in order to improve practices of collecting and processing personal data as well as security and in order to comply with the applicable law. Cobuilder Online Services may contain links to other websites or show content linked from third party sources. Cobuilder is not responsible for the privacy practices, security, or content of these sites.

## **Questions**

For any questions or comments regarding this Privacy Policy or Cobuilder Online Services, contact us at [support@cobuilder.no](mailto:support@cobuilder.no).

Cobuilder, January 2024.