

# Privacy Notice

## 1. Introduction

We would like to use the information below to provide you "data subject" with an overview of our processing of your personal data and your rights under data protection law. It is generally possible to use our website without entering personal data. However, if you wish to make use of special services offered by our company through our website, it may be necessary to process personal data. If it is necessary to process personal data and there is no legal basis for such processing, we will generally obtain your consent.

Personal data, such as your name, address or email address, is always processed in accordance with the EU General Data Protection Regulation (GDPR) and in accordance with the country-specific data protection regulations applicable to the "ASENDIA Management SAS". The aim of this Privacy Notice is to inform you about the scope and purpose of the personal data we collect, use and process.

As the data controller, we have implemented numerous technical and organizational measures to ensure the most complete possible protection of the personal data processed via this website. Nevertheless, Internet-based data transmissions can in principle have security gaps so that absolute protection cannot be guaranteed. For this reason, you are free to submit personal data on alternative ways, such as by phone or by post to us.

## 2. Data controller

The controllers are:

**ASENDIA MANAGEMENT SAS**  
Registered under Paris Commercial Register (RCS) under number: 752 460 170

**Company Visiting Address and Contact Details:**  
(CP Y805) 9 Rue du Colonel Pierre Avia  
75015 Paris  
France  
**Telephone number:** 0080088877700  
**Email address:** [info.com@asendia.com](mailto:info.com@asendia.com)  
**Website:** [www.asendia.com](http://www.asendia.com)

**ASENDIA NORWAY AS**  
Company Number: 997 412 109

**Company Visiting Address and Contact Details:**  
Brekkerødveien 42  
1782 Halden  
Norway  
**Telephone number:** +4792055074;  
+4746444623  
**Email address:** [info.no@asendia.com](mailto:info.no@asendia.com)  
**Website:** [www.asendia.no](http://www.asendia.no)

## 3. Data protection Manager Contact details

You can reach the data protection managers as follows:

**ASENDIA MANAGEMENT SAS**  
Group Data Protection Manager (CP Y805)  
9 rue du Colonel Pierre Avia  
75015 Paris France  
  
[dataprotection@asendia.com](mailto:dataprotection@asendia.com)

**ASENDIA NORWAY AS**  
Data Protection Manager  
Brekkerødveien 42  
1782 Halden  
Norway  
  
[dataprotection.no@asendia.com](mailto:dataprotection.no@asendia.com)

You may contact our data protection manager directly at any time if you have any questions or suggestions regarding data protection.

## 4. Definitions

This Privacy Notice is based on the terminology used by the European legislature and legislature in the adoption of the General Data Protection Regulation (GDPR). Our privacy policy should be easy to read and understand, both for the public and for our customers and business partners. To ensure this, we would like to explain in advance the terminology used. Among other things, we use the following terms in this privacy policy.

We use the following terms in this Privacy Notice, among others:

### 1. Personal data

Personal data means 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.

### 2. Data subject

A data subject is any identified or identifiable natural person whose personal data is processed by the data controller (our company).

### 3. Processing

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

### 4. Restriction to processing

Restriction to processing means marking stored personal data with the aim of limiting its processing in future.

### 5. Profiling

Profiling means any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

### 6. Pseudonymisation

Pseudonymisation is the processing of personal data in such a way that the data can no longer be assigned to a specific data subject without additional information being provided, given that such additional information is kept separate and subject to appropriate technical and organisational measures that ensure that personal data cannot be attributed to an identified or identifiable natural person.

### 7. Data processor

The processor is a natural or legal person, public authority, agency or other body which processes personal data on behalf of the controller.

### 8. Recipient

Recipient means a natural or legal person, public authority, agency or another body, to which the personal data is disclosed, whether a third party or not. However, public authorities which may receive personal data in the framework of a particular inquiry in accordance with Union or Member State law shall not be regarded as recipients.

## **9. Third parties**

Third party means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## **10. Consent**

Consent is any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

# **5. Legal basis for processing**

Article 6 Paragraph 1(a) GDPR serves as our company's legal basis for processing operations in which we obtain consent for a specific processing purpose.

If the processing of personal data is necessary for the performance of a contract to which you are a party, as is the case, for example, with processing operations that are necessary for the delivery of goods or the provision of other services or consideration, processing is based on Article 6 Paragraph 1(b) GDPR. The same applies to those processing operations required to carry out pre-contractual measures, such as in cases of queries regarding our products or services.

If our company is subject to a legal obligation requiring the processing of personal data, such as for the fulfilment of tax obligations, processing is based on Article 6 Paragraph 1(c) GDPR.

In rare cases, processing of personal data may be necessary to protect the vital interests of the data subject or of another natural person. This would be the case, for example, if someone visiting our business were to be injured and their name, age, health insurance data or other vital information needed to be disclosed to a doctor, hospital or other third party. Processing would then be based on Article 6 Paragraph 1(d) GDPR.

Finally, processing operations could be based on Article 6 Paragraph 1(f) GDPR. Processing operations not based on any of the above-mentioned legal bases may be carried out on the basis of Article 6 Paragraph 1(f) GDPR if processing is necessary to safeguard the legitimate interests of our company or those of a third party, provided the interests and fundamental rights and freedoms of the data subject do not take precedence. We are permitted to engage in such processing operations in particular because they have been specifically mentioned in European law. In this respect, the legislature took the view that a legitimate interest could be assumed if you are a customer of our company (Recital 47 Sentence 2 GDPR).

# **6. Disclosure of data to third parties**

Your personal data will not be sent to third parties for purposes other than those listed below.

We will disclose your personal data to third parties if:

1. you have expressly consented to this pursuant to Article 6 Paragraph 1 Sentence 1(a) GDPR,
2. disclosure under Article 6 Paragraph 1 Sentence 1(f) GDPR is permitted to safeguard our legitimate interests and there is no reason to assume that you have an overriding legitimate interest in not disclosing your data,
3. in the event that there is a legal obligation to disclose your data pursuant to Article 6 Paragraph 1 Sentence 1(c) GDPR and

4. if this is legally permissible and necessary for the performance of our contract with you pursuant to Article 6 Paragraph 1 Sentence 1(b).

To protect your data and if necessary enable us to transfer data to third countries (outside the EU), we have concluded data processing agreements ("Data Processing Agreement") based on the standard contractual clauses of the European Commission.

## **7. Technology**

### **7.1 SSL/TLS encryption**

This site uses SSL or TLS encryption to **ensure** the security of data processing and to protect the transmission of confidential content, such as orders, login details or contact requests that you send to us as the website operator. You can recognise an encrypted connection by your browser's address bar reading "https://" instead of "http://" and the lock symbol in the browser bar.

We use this technology to protect your transmitted data.

### **7.2 Data collection when visiting the website**

If you only use our website for informational purposes, i.e. if you do not register or otherwise provide us with information, we only collect the data your browser sends our server (in what is known as "server log files"). Our website collects a range of general data and information each time you access a website or an automated system. This general data and information is stored in the server's log files. It may be collected.

1. the browser types and versions used,
2. the operating system used by the accessing system,
3. the website from which an accessing system accesses our website (called a referrer),
4. the sub-pages accessed via an accessing system on our website,
5. the date and time the website is accessed,
6. an internet protocol address (IP address) and
7. the accessing system's internet service provider.

No conclusions are drawn about you when using this general data and information. Instead, this information is needed to:

1. properly deliver our website content,
2. to optimise the content of the website as well as to advertise it,
3. to ensure the continued functioning of our information technology systems and our website's technology as well as to
4. provide the information necessary for law enforcement authorities to prosecute in the event of a cyber-attack.

This collected data and information is therefore statistically analysed and further analysed by us with the aim of increasing data protection and data security within our company to ultimately ensure an optimum level of protection for the personal data being processed by us. The data from the server log files is stored separately from all personal data provided by a data subject.

The legal basis for data processing is Article 6 Paragraph 1 Sentence 1(f) GDPR. Our legitimate interest is based on the purposes listed above for the collection of data.

## **8. Cookies**

## **8.1 General information about cookies**

We use cookies on our website. Cookies are small files that are automatically created by your browser and stored on your IT system (laptop, tablet, smartphone, etc.) when you visit our website.

Information generated from the specific device used is stored in cookies. This does not mean, however, that we will gain immediate knowledge of your identity.

The use of cookies helps us make it more convenient for you to use our website. For example, we use session cookies to detect whether you have already visited individual pages on our website. These are erased automatically when you leave our website.

We also use temporary cookies to optimise user-friendliness and to document your consent to placement of non-technically necessary cookies on your IT system if and to the extent such consent is granted. These cookies are stored on your device for a specific period of time. If you return to our website to use our services, cookies allow us to automatically recognise that you have visited our website previously and remember the inputs and settings you have made so that you do not have to enter them again.

We also use cookies to statistically record the use of our website and analyse it for the purpose of optimising our services. These cookies allow us to automatically recognise that you have already visited our website when you visit our website again. These cookies are automatically erased after a defined period of time.

## **8.2 Legal basis for the use of cookies**

The data processed by cookies, which are required for the proper functioning of the website, are to safeguard our legitimate interests pursuant to Article 6 Paragraph 1 Sentence 1(f) GDPR.

For the following functions cookies are required for technical reasons:

- (1) acceptance of language settings
- (2) updating cookie preferences

The processing of your data by our consent-cookie is necessary to comply with our obligation to document your consent (Art. 7 Paragraph 1 GDPR). This processing based on Art. 6 Paragraph 1 Sentence 1 (c) GDPR.

For all other cookies you have given your consent to this through our opt-in cookie banner in accordance with Article 6 Paragraph 1 Sentence 1 (a) GDPR.

## **9. Contents of our website**

### **9.1 Hubspot**

On this website we use HubSpot for our online marketing activities (including E-mail marketing newsletters and automated mailings, social media publishing & reporting, reporting (e.g. traffic sources, access), contact management (e.g. user segmentation & CRM), landing pages and contact form). HubSpot is a marketing automation tool used for web hosting, email marketing and social media marketing. It tracks and reports internet activities. HubSpot uses the following data collected to track and monitor the use of our service:

- in anonymous form: browser information, demographic data, hardware/software type, page views, serving domains
- in pseudonymous form: IP address, location based data, clickstream data

- in contact form: name and personal contact details (email address, telephone number), company name, content interest, web interaction, downloaded materials

HubSpot is a US-based company. The transfer of your personal data to the US is based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

If and where not stated differently in this privacy notice, the legal basis for our use of the services of Hubspot is Art. 6 Paragraph 1 (f) GDPR – legitimate interest. Our legitimate interest in using this service is the optimization of our marketing efforts and the improvement of our service quality on the website.

For more information on the privacy practices of HubSpot, please visit the HubSpot Privacy & Terms web page: <https://legal.hubspot.com/privacy-policy>

## **9.2 Contact/contact form**

Personal data is collected when you contact us (e.g. using our contact form or by email). If you use a contact form to get in touch with us, the contact form you use will indicate the data being collected. This data is stored and used exclusively for the purpose of responding to your query or establishing contact and the associated technical administration. The legal basis for data processing is our legitimate interest in responding to your request pursuant to Article 6 Paragraph 1(f) GDPR. If the aim of you contacting us is to conclude a contract, processing is also legally based on Article 6 Paragraph 1(b) GDPR. Your data will be erased once we have finished processing your query. This is the case when it can be inferred from the circumstances that the relevant facts have been clarified in a conclusive manner and there are no statutory retention obligations in place that prevent its erasure.

## **9.3 Application management/job exchange**

We collect and process the personal data of applicants for the purpose of carrying out the application process. Processing may also be carried out electronically. This is particularly the case if an applicant submits corresponding application documents to us electronically, for example by email or via a web form on the website. If we conclude an employment contract with an applicant, the data transmitted will be stored for the purpose of processing the employment relationship in compliance with the statutory provisions.

Legal basis for this processing of the data is Article 88 GDPR in combination with the applicable local data privacy legislation on processing of personal data in the context of a decision on the establishment of an employment relationship and after establishment of the employment relationship for its execution or termination.

If we do not conclude an employment contract with the applicant, the application documents will be automatically erased after expiry of the period available to the applicant to assert his possible claims for unjustified unequal treatment under the applicable law on equal treatment

provided that no other legitimate interests of ours prevent their erasure. Other legitimate interests in this context include, for example, the duty to provide evidence in proceedings under applicable local legislation on equal treatment.

# **10. Newsletters / E-Books / Reports**

## **10.1 Download of E-Books and Reports**

Personal data is collected when you download our E-Books or Reports by using the corresponding input form. This data is stored and used to evaluate the interest of our potential customers in further products and services provided by Asendia. The legal basis for

data processing is our legitimate interest in the aforesaid evaluation pursuant to Article 6 Paragraph 1 sentence 1 lit. (f) GDPR.

Your above data will be stored for 6 months if you did not further interact (e.g. if you have not opened the last 6 emails) with us.

If you grant your consent to further contact with our sales organization or our partners in the context of downloading our E-Books or Reports, our sales team or our partners will reach out to you to discuss a potential collaboration with Asendia. This processing activity is based on Art. 6 Paragraph 1 sentence 1 lit. a) GDPR). Your data will in this case be stored until your withdrawal of the initial consent granted to such contact.

## **10.2 Newsletter for regular customers**

If you have provided us with your email address when purchasing goods or services, we reserve the right to send you regular emails with offers on products or services from our collection similar to those you have already purchased. We do not require your specific consent for such purposes if the applicable local data privacy and competition law allows for sending of such emails without your specific prior consent. The sole basis for the data processing is our legitimate interest in personalized direct marketing in line with Article 6 Paragraph 1 sentence 1 lit. f) GDPR. We will not send you any emails should you expressly object to the use of your email address for that purpose. You are entitled to object to the use of your email address for the aforementioned purpose at any time with immediate effect by notifying the data controllers listed in the opening of this statement. By taking this action, you will incur submission fees only in line with basic rates. After receipt of your objection, your email address will immediately be removed for marketing purposes.

## **10.3 Marketing newsletter**

You can subscribe to our newsletters via our website. The input screen determines which personal data are shared with us when subscribing to the newsletter.

We use our newsletter to regularly communicate our offers to our customers and business partners. You can, therefore, only receive our company's newsletter if

1. you have a valid email address and
2. have registered for the newsletter.

For legal reasons under EU/EEA-legislation, as part of the double opt-in procedure carried out in the EU/EEA, a confirmation email will be sent to the email address you provided when registering for the newsletter. This confirmation email is sent to check if you are the holder of the email address and have authorised the newsletter.

When you register for the respective newsletter we also save the IP address used by your IT system at the time of registration, which is issued by your Internet Service Provider (ISP) as well as the date and time of registration. We must collect this data to investigate any (possible) misuse of your email address at a later stage and it is therefore lawful for the purposes of our security.

The personal data collected during registration are used solely for sending our newsletters. Furthermore, subscribers to the newsletters may receive information via email if this is required in order to administer the newsletter service for registration purposes, which may be the case if our newsletters are amended or technical circumstances change. Personal data collected for our newsletter service are not shared with third parties. You may terminate your subscription to our newsletters at any time. You can at any time withdraw your consent to the storage of the personal data you shared during registration. A link is provided in each newsletter to allow you to withdraw your consent. It is also possible to unsubscribe from our newsletter directly through the website or to contact us in another manner.

The legal basis for data processing for the purposes of sending a newsletter is Article 6 Paragraph 1 sentence 1 lit. a) GDPR.

#### **10.4 Newsletter tracking**

Our newsletters contain what are known as tracking pixels. A tracking pixel is a miniature graphic embedded in emails sent in HTML format to enable the recording and analysis of log files. This allows for a statistical analysis of the success or failure of online marketing campaigns. The embedded tracking pixel allows the company to determine if and when an email was opened by you and what links you accessed in the email.

We store and analyse the personal data collected via the tracking pixel contained in the newsletters in order to optimise the sending of our newsletters and to adapt the content of future newsletters to even better suit your interests. This personal data will not be disclosed to third parties. Data subjects are entitled to revoke the relevant declaration of consent granted separately and submitted via the double opt-in procedure at any time. Once consent has been revoked, we erase this personal data. Unsubscribing from the newsletter will automatically be interpreted as revocation.

The analysis is carried out on basis of your consent, granted when subscribing for receipt of the newsletter, Article 6 Paragraph 1 sentence 1 lit. a) GDPR.

In case our newsletter should be sent without your prior specific consent (see Section 10.2), the analysis is carried out on the basis of our legitimate interests in displaying personalized advertising, market research and/or the design of our website commensurate to market needs, Article 6 Paragraph 1 sentence 1 lit. f) GDPR.

### **11. Our activities in social networks**

To allow us to communicate with you on social networks and inform you about our services, we run our own pages on these social networks. If you visit one of our social media pages, we and the provider of the social media network are joint controllers (Art. 26 GDPR) regarding to the processing operations triggered thereby, which concern personal data.

We are not the original provider of these pages, but only use them within the scope of the options offered to us by the respective providers. We would therefore like to point out as a precautionary measure that your data may also be processed outside of the European Union or the European Economic Area. Use of these networks may therefore involve data protection risks for you since the protection of your rights may be difficult, e.g. your rights to information, erasure, objection, etc. Processing on social networks frequently takes place directly for advertising purposes or for the analysis of user behaviour by network providers, and we have no control over this. If the provider creates user profiles, cookies are often used or user behaviour may be assigned directly to your own member profile on the respective social network (if you are logged in).

The processing operations of personal data described are carried out in accordance with Article 6 Paragraph 1(f) GDPR on the basis of our legitimate interests and the legitimate interests of the respective provider in order to communicate with you in a timely manner or to inform you about our services. If you have to grant your consent to the respective providers to process your data as a user, the legal basis for this processing is Article 6 Paragraph 1(a) GDPR in conjunction with Article 7 GDPR.

Since we have no access to these providers' databases, we would like to point out that you would be best placed to exercise your rights (e.g. to information, rectification, erasure, etc.) directly with the respective provider. More information on the processing of your data on social networks and your options for exercising your right to object or your right of revocation (opt out) is listed below for each of the social network providers we use:



## 11.1 Instagram

(Jointly) Data controller responsible for data processing in Europe:

Facebook Ireland Ltd, 4 Grand Canal Square, Grand Canal Harbour, Dublin 2, Ireland

Privacy Notice (Data Policy):

<http://instagram.com/legal/privacy/>

Opt-out and advertising settings:

[https://www.instagram.com/accounts/privacy\\_and\\_security/](https://www.instagram.com/accounts/privacy_and_security/)

## 11.2 LinkedIn

(Jointly) Data controller responsible for data processing in Europe:

LinkedIn Ireland Unlimited Company, Wilton Place, Dublin 2, Ireland

Privacy Notice:

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

Opt-out and advertising settings:

<https://www.linkedin.com/psettings/guest-controls/retargeting-opt-out>

## 11.3 Twitter

(Jointly) Data controller responsible for data processing in Europe:

Twitter International Company, One Cumberland Place, Fenian Street, Dublin 2, D02 AX07, Ireland

Privacy Notice:

<https://twitter.com/en/privacy>

Information about your data:

[https://twitter.com/settings/your\\_twitter\\_data](https://twitter.com/settings/your_twitter_data)

Opt-out and advertising settings:

<https://twitter.com/personalization>

## 11.4 YouTube

(Jointly) Controller responsible for data processing in Europe:

Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland

Privacy Notice:

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

Opt-out and advertising settings:

<https://adssettings.google.com/authenticated>

## 12. Web analytics

### 12.1 Google Analytics

We use Google Analytics, a web analytics service provided by Google Ireland Limited (<https://www.google.com/about/>) (Gordon House, Barrow Street, Dublin 4, Ireland; hereinafter referred to as "Google"), on our website. As part of this, pseudonymised user profiles are created and cookies (see the section on "Cookies") are used. The information generated by the cookie about your use of this website, such as your browser

1. browser type/version
2. operating system
3. referrer URL (website previously visited), host

4. name of the accessing computer (IP address) and
5. time of server request,

is transmitted to a Google server in the US and stored there. This information is used to evaluate your use of this website, to compile reports on the website activities, and to perform further services linked to website and internet use for market research purposes and to tailor the design of this website. This information may also be sent to third parties if this is legally required or if third parties process this data on behalf of Google. Under no circumstances will your IP address be associated with any other data. IP addresses are anonymised so that it is not possible to assign them to individuals (known as IP masking).

You may refuse the use of cookies by selecting the appropriate settings on your browser; however, we would point out that this may result in you not being able to use all the features of this website.

Please be aware, that in Google Analytics will appear as doubleclick.net in your cookie-manager.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

You can also prevent the data generated by the cookie about your use of the website (including your IP address) from being sent to and processed by Google by downloading and installing the available browser add-on (<https://tools.google.com/dlpage/gaoptout?hl=en>).

As an alternative to the browser add-on, especially for browsers on mobile devices, you can also prevent Google Analytics from capturing data by clicking on the following link: Deactivate Google Analytics. This sets an opt-out cookie that prevents the future collection of your data when visiting this website. The opt-out cookie is only valid on this browser and only for our website and is stored on your device. If you erase the cookies stored for this browser, you will need to reset the opt-out cookie.

Transfers of your personal data to the US are based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

Additional information on data protection with respect to Google Analytics is available on the Google Analytics website in the help section (<https://support.google.com/analytics/answer/6004245?hl=en>).

## **12.2 Google Analytics Remarketing**

We have integrated services by Google Remarketing on this website. Google Remarketing is a Google Ads feature that enables a company to display advertisements to internet users who have previously visited the company's website. Integrating Google Remarketing therefore allows a company to create user-based advertisements and consequently to display advertisements of interest to that particular internet user.

Google Remarketing services are operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of Google Remarketing is to display advertisements that are relevant to your interests. Google Remarketing allows us to display advertisements that are tailored to the individual needs and interests of internet users through the Google advertising network or on other websites.

Google Remarketing places a cookie on your IT system. Setting cookies enables Google to recognise visitors to our website who subsequently visit websites that are also members of the Google advertising network. Every time you visit a website that has integrated Google Remarketing services, your browser automatically identifies itself to Google. As part of this technical process, Google obtains knowledge of personal data, such as your IP address or browsing behaviour, which Google uses, among other things, to display advertisements relevant to your interests.

Cookies are used to store personal information, such as the websites you visit. Each time you visit our website, this personal data, including your IP address, is transferred to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may disclose personal data collected through this technical process to third parties.

As stated above, you can prevent cookies being placed by our website at any time by adjusting your web browser's settings to permanently refuse cookies. Adjusting the browser's settings in this way would also prevent Google from placing a cookie on your IT system. In addition, a cookie already placed by Google Analytics can be deleted at any time through a web browser or other software programs.

You also have the option to object to Google's interest-based advertising. To do this, you must visit [www.google.com/settings/ads](http://www.google.com/settings/ads) from each of the web browsers you use and adjust the settings there as desired.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

Transfers of your personal data to the US are based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

Additional information and Google's privacy policy can be found at <https://www.google.com/policies/privacy/>.

### **12.3 HubSpot**

We have integrated services by HubSpot on this website.

HubSpot tracks visitors of our website using [browser cookies](#). Every time you access our website, HubSpot will check for an existing HubSpot tracking cookie. If such cookie should not already be placed on your browser, a HubSpot cookie will – subject to your consent - be placed on your browser and will log every of our websites that you access moving forward.

There are a few things to be aware of in regard to how HubSpot handles tracking cookies:

- Your visit to our websites will be tracked via the HubSpot-Cookie only after you have granted consent to placement of the HubSpot-Cookie or all tracking cookies.
- Should you fill out and submit one of the forms on our websites (e.g. a contact form) and should you have granted consent to placement of the HubSpot-Cookie, HubSpot will associate your previous page views based on the tracking cookie with the form submitted by you.
- Should you already have been in contact with us, your email address submitted via the form will be associated with your information already stored by us.
- Should you delete all your cookies or specifically delete the HubSpot-cookies, you will be considered a new visitor to our websites and will be assigned a new cookie. However, HubSpot will automatically deduplicate form submissions coming from the

same email address, even if different browser cookies were associated with the submissions.

- Since cookies are unique to a browser, if two people share a single computer, their submissions will be associated with the same contact record. This [deduplication by cookie](#) ensures that if a contact submits forms on your website using different email addresses, all submissions are associated with a single contact record in HubSpot.
- HubSpot will attribute page views to a contact if the contact clicks a link in a tracked marketing email which directs to a page with the [HubSpot tracking code](#) installed.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR. Your data will be stored until withdrawal of your consent.

Transfers of your personal data to the US are based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

Additional information and HubSpot's privacy policy can be found under <https://legal.hubspot.com/privacy-policy>

## 13. Advertising

### 13.1 Google Ads (formerly AdWords)

Our website uses the functions of Google Ads, which we use to advertise this website in Google's search results as well as on third party websites. The provider is Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland ("Google"). To this end, Google places a cookie on your device's browser, which automatically uses a pseudonymous cookie ID and facilitates interest-based advertising on the basis of the websites you have visited.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

No further processing will take place unless you have consented to Google linking your internet and app browsing history to your Google account and using information from your Google account to personalise ads you view online. In this case, if you are logged in to Google during your visit to our website, Google will use your information in conjunction with Google Analytics data to create and define target audience lists for cross-device remarketing. Google will temporarily link your personal data with Google Analytics data in order to form target groups.

You can permanently disable the setting of cookies for ad preferences by downloading and installing the browser plug-in available from the following link:  
<https://www.google.com/settings/ads/onweb/>.

Alternatively, you can contact the Digital Advertising Alliance at [www.aboutads.info](http://www.aboutads.info) to find out about the setting of cookies and configure your settings. Finally, you can adjust your browser's settings in such a way that you are informed about the use of cookies and you only permit the acceptance of cookies on an individual basis or in certain cases; alternatively you may adjust these settings to generally block cookies. Not accepting cookies may limit the functionality of our website.

Transfers of your personal data to the US are based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

More information and the privacy policy regarding advertising and Google can be found here: <https://www.google.com/policies/technologies/ads/>.

### **13.2 Google AdSense**

We have integrated Google AdSense on this website. Google AdSense is an online service that enables the placement of advertisements on third-party websites. Google AdSense is based on an algorithm that selects the advertisements displayed on third-party websites according to the content of the third-party site in question. Google AdSense facilitates the targeting of internet users on the basis of their interests, which is implemented by generating individual user profiles.

The Google AdSense component is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of the Google AdSense component is to display advertisements on our website. Google AdSense places a cookie on your IT system. The placement of this cookie enables Alphabet Inc. to analyse the usage of our website. Each time someone opens an individual page of this website, which is run by us and on which a Google AdSense component is integrated, the Google AdSense component in question will trigger the browser on your IT system to automatically send data to Alphabet Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, USA, for online marketing purposes and to charge commission. As part of this technical process, Alphabet Inc. receives information about personal data, such as your IP address, which, among other things, enables Alphabet Inc. to track the origin of visitors and clicks, and subsequently charge commission.

You can prevent cookies being placed by our website at any time by adjusting your web browser's settings to permanently refuse cookies. Adjusting the browser's settings in this way would also prevent Alphabet Inc. from placing a cookie on your IT system. In addition, a cookie already placed by Alphabet Inc. can be deleted at any time through a web browser or other software programs.

Google AdSense also uses tracking bugs. A tracking bug is a miniature graphic embedded in websites to enable the recording of log files and analytics for subsequent statistical analysis. The embedded tracking bug allows Alphabet Inc. to determine if and when a website was opened by your IT system and what links you clicked. Among other things, tracking bugs help analyse the flow of visitors to a website.

Through Google AdSense, personal data and information, which also includes your IP address and is necessary for the collection and billing of advertisements displayed, is sent to Alphabet Inc. in the United States of America. This personal data is stored and processed in the United States of America. Alphabet Inc. may disclose personal data collected through this technical process to third parties.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR

Transfers of your personal data to the US are based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

Google AdSense is explained in more detail at <https://www.google.de/adsense/start/>.

### **13.3 Google Ads with conversion tracking**

We have integrated Google Ads on this website. Google Ads is an internet advertising service that allows advertisers to run adverts in both Google and Google advertising network

search engine results. Google Ads allows an advertiser to predefine keywords that will display an ad on Google's search engine results only when the search engine retrieves a keyword-related search result. On the Google Network, ads are distributed to relevant websites using an automated algorithm and according to predefined keywords.

Google Ads is operated by Google Ireland Limited, Gordon House, Barrow Street, Dublin 4, Ireland.

The purpose of Google Ads is to promote our website by displaying interest-based advertising on third-party websites and in the search engine results of Google's search engine and by displaying third-party ads on our website.

If you arrive on our website via a Google advert, what is known as a conversion cookie will be stored on your IT system by Google. A conversion cookie expires after 30 days and is not used to identify you. Provided the cookie has not expired, the conversion cookie is used to trace whether certain sub-pages, such as the shopping cart of an online shop system, were accessed on our website. The conversion cookie tells us and Google whether any revenues was generated by a user who arrived on our website via an Ads ad, i.e. if they completed or cancelled a purchase.

The data and information collected through the use of the conversion cookie is used by Google to provide visitor statistics for our website. We then use these visitor statistics to determine the total number of users who have been directed to us through Ads ads in order to determine the success or failure of each Ads ad and to optimise our Ads ads for the future. Neither our company nor any other Google Ads advertisers receive any information from Google that could identify you.

Conversion cookies are used to store personal information, such as the websites you visit. Each time someone visits our website, this personal data, including the IP address of the internet connection you are using, is sent to Google in the United States of America. This personal data is stored by Google in the United States of America. Google may disclose personal data collected through this technical process to third parties.

You can prevent cookies being placed by our website at any time by adjusting your web browser's settings to permanently refuse cookies. Adjusting the browser's settings in this way would also prevent Google from placing a conversion cookie on your IT system. In addition, a cookie already placed by Google Ads can be deleted at any time through a web browser or other software programs.

You also have the option to object to Google's interest-based advertising. To do this, you must visit [www.google.com/settings/ads](http://www.google.com/settings/ads) from each of the web browsers you use and adjust the settings there as desired.

These processing operations only take place if express consent is granted in accordance with Art. 6 Paragraph 1(a) GDPR.

Transfers of your personal data to the US are based on the standard contractual clauses. To receive a copy of the standard contractual clauses please contact us under the contact details under Section 2 of this privacy note.

Additional information and Google's privacy policy can be found at <https://www.google.com/policies/privacy/>.

## **14. Plugins and other services**

### **14.1 Adobe Typekit**

We use Adobe Typekit for the visual design of our website. Typekit is a service provided by Adobe Systems Software Ireland Ltd. which gives us access to a font library. To incorporate the fonts we use, your browser must connect to an Adobe server in the US and download the font required for our website. This will tell Adobe that your IP address has been used to access our website. For more information about Adobe Typekit, please see the Adobe privacy policy at: [www.adobe.com/privacy/typekit.html](http://www.adobe.com/privacy/typekit.html).

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

## **14.2 Google Tag Manager**

This website uses Google Tag Manager, a cookie-free domain that does not collect personally identifiable information.

With this tool, "website tags" (i.e. keywords that are integrated into HTML elements) can be implemented and managed via an interface. By using the Google Tag Manager, we can automatically track which button, link or customised image you have actively clicked and then record which content on our website is of particular interest to you.

The tool also triggers other tags that may themselves collect data. Google Tag Manager does not access this data. If you have disabled it at the domain or cookie level, it will remain in place for all tracking tags implemented with Google Tag Manager.

These processing operations only take place if express consent is granted in accordance with Article 6 Paragraph 1(a) GDPR.

## **15. Your rights as a data subject**

### **15.1 Right to confirmation**

You have the right to request confirmation from us as to whether personal data relating to you will be processed.

### **15.2 Right to information (Article 15 GDPR)**

You have the right to obtain information about the personal data stored about you at any time, free of charge, as well as the right to access a copy of such data from us, in accordance with the statutory provisions.

### **15.3 Right to rectification (Article 16 GDPR)**

You have the right to request the immediate rectification of incorrect personal data relating to yourself. Furthermore, the data subject has the right to request the completion of incomplete personal data, taking into account the purposes of the processing.

### **15.4 Erasure (Article 17 GDPR)**

You have the right to demand that we erase the personal data relating to you be deleted without delay, provided that one of the reasons provided by law applies and if processing or further storage is not required.

### **15.5 Restriction to processing (Article 18 GDPR)**

You have the right to request that we restrict the processing of your data if one of the legal requirements is met.

### **15.6 Data transferability (Article 20 GDPR)**

You have the right obtain personal data relating to you that you provided us in a structured, commonly used and machine-readable format. You also have the right to transfer this data to another controller without hindrance by us, to whom the personal data was provided, provided that the processing is based on the consent pursuant to Article 6 Paragraph 1(a)

GDPR or Article 9 Paragraph 2(a) GDPR or on a contract pursuant to Article 6 Paragraph 1(b) GDPR, and the data are processed using automated procedures, unless processing is necessary to complete a task, is in the public interest or is carried out in the exercise of an official authority assigned to us.

Furthermore, when exercising your right to data transferability pursuant to Article 20 Paragraph 1 GDPR, you have the right to have personal data transferred directly from one controller to another, provided this is technically feasible and does not impede the rights and freedoms of other persons.

### **15.7 Objection (Article 21 GDPR)**

**You have the right to lodge an objection to the processing of personal data relating to you for reasons relating to your particular situation where this is done on the basis of Article 6 Paragraph 1(e) (data processing in the public interest) or (f) (data processing on the basis of the weighing of legitimate interests) GDPR.**

**This also applies to profiling based on these provisions pursuant to Article 4 Number 4 GDPR.**

**Should you lodge an objection, we will no longer process your personal data unless we can demonstrate compelling and legitimate reasons for such processing that outweigh your interests, rights and freedoms, or where processing serves the assertion, exercise or defence of legal claims.**

**In individual cases, we process your personal data for direct marketing purposes. You have the right to object at any time to the processing of personal data for the purpose of such advertising. This also applies to profiling where this is connected to this kind of direct marketing. Should you object to the processing of your data for direct marketing purposes, we will no longer process your personal data for this purpose.**

**In addition, you have the right to object to our processing of your personal data for scientific or historical research purposes or for statistical purposes pursuant to Article 89 Paragraph 1 GDPR for reasons arising from your particular situation, unless such processing is necessary for the performance of a task in the public interest.**

**You are free to exercise your right to lodge an objection in relation to the use of information society services, Directive 2002/58/EC notwithstanding, by means of automated procedures using technical specifications.**

### **15.8 Revocation of consent regarding data protection**

You have the right to revoke any consent to the processing of personal data at any time with future effect.

### **15.9 Lodging a complaint with a supervisory authority**

You have the right to complain to a supervisory authority responsible for data protection about our processing of personal data.

## **16. Routine storage, erasure and blocking of personal data**

We process and store your personal data only for the period of time necessary to meet the storage purpose or as required by the legal provisions to which our company is subject.

If the storage purpose no longer applies or if a required retention period expires, personal data will be routinely blocked or erased in accordance with the statutory provisions.



## **17. Duration of storage of personal data**

The criterion for the duration of the retention of personal data is the respective legal retention period. Once this period expires, the data in question will be routinely erased, provided it is no longer required for the fulfilment or initiation of the contract.

## **18. Version and amendments to the Privacy Notice**

This Privacy Notice is currently valid and was last updated on September 2020.

It may be necessary for us to amend this Privacy Notice in the process of further developing our website and the services we offer through our website or due to changes in legal or regulatory requirements. You can view and print our current Privacy Notice on the website at any time by visiting

["https://www.asendia.no/hubfs/Privacy%20Policies/AsendiaNorway.ENG\\_PrivacyPolicy\\_31-10-2020.pdf"](https://www.asendia.no/hubfs/Privacy%20Policies/AsendiaNorway.ENG_PrivacyPolicy_31-10-2020.pdf).

This privacy statement has been prepared with the assistance of the privacy software: audatis MANAGER.