

DATA PROTECTION AND PRIVACY POLICY FOR FLEXTRIBE APS

Date of last change in privacy policy: November 19, 2018

Flextribe ApS processes personal information and has therefore adopted this data protection and privacy policy, which briefly describes how we treat your personal information to ensure proper and transparent processing.

Throughout our data processing, we only treat personal data for specific purposes and based on legitimate interests. We process only personal information that is relevant and necessary for fulfilling the stated purposes and we will delete your information when they are no longer necessary.

1) The Data Controller

Flextribe ApS is the data controller and we ensure that your personal information is processed in accordance with the laws.

Contact info:
Flextribe ApS
Ragnagade 7
2100 København Ø
www.flextribe.dk
e-mail: hello@flextribe.dk
cvr-nr.: 39724936

2) Processing of personal data

We treat the following personal information:

- 1) Information about employees, former employees and applicants:
 - > General Personal Information:
 - Registration and contact information such as name, gender, address, phone number, e-mail address, bank account number
 - > Personal Information Added a Higher Protection:
 - > - Social Security No.
 - > - Optionally: Person and behavioral analysis
- 2) Information about customers, former customers and potential customers:
 - > General Personal Information:
 - Contact information such as name, address, phone number e-mail address, professional interests and purchase history
 - > Personal Information Added a Higher Protection:
 - None
- 3) Information about consultants, former consultants and potential consultants:
 - > General Personal Information:
 - Contact details such as name, picture, address, telephone number e-mail address, bank account number, professional interests, competencies and CV
 - > Personal Information Added a Higher Protection:
 - Optionally: Person and behavioral analysis

- 4) Information about shareholders:
- > General Personal Information:
 - > - Registration and contact information such as name, address, phone number, e-mail address, bank account number
 - > Personal Information Added to a Higher Protection:
 - > - Social Security No.

3) Here we collect information from

Normally, the information is received directly from the registered person. In some instances, information from other sources is obtained / received:

- > TAX - to collect tax information concerning personnel matters
- > POLICE - for obtaining statutory certificates or the like.
- > SOCIAL MEDIA eg. LinkedIn and Slack

4) Flextribe's purpose of processing your personal information

We treat your personal information for specific purposes when we have a legitimate reason.

Legal reasons for treatment are special:

- > Flextribe's legitimate interests in processing your information (the interest rate rule)
- > Required to fulfill a contract / agreement
- > Treatment according to legal requirements
- > Treatment with consent

The objectives:

- a) Purpose of processing information on employees:
 - > Managing employment conditions
 - > Payment of salaries including pensions, allowances, refunds and similar
 - > Compliance with legal requirements
- b) Purpose of processing information on customers:
 - > Flextribe's customer administration, including hourly registration and billing for completed work
 - > As part of Flextribe's activities, including planning, implementation and follow-up of projects, deliveries and administration of the relationship between the parties.
 - > Newsletters and invitations to events if consent has been given
 - > Compliance with legal requirements
- c) Purpose of processing information on consultants:
 - > Flextribe's consultancy administration including time registration and payment for work done
 - > As part of Flextribe's activities, including planning, implementation and follow-up of new projects / tasks, ongoing projects, deliveries and management of the relationship between the parties.
 - > Newsletters and invitations to professional events if consent has been given
 - > Compliance with legal requirements
- d) Purpose of Processing Information on Shareholders:
 - > Handling of owner's book and purchase / sale of shares
 - > Payment of any yield
 - > Compliance with legal requirements

5) Treatment Basis

Flextribe treats common personal data of the registrants as described above under item 2 based on the following treatment bases:

a) The balance of interests rule

To the extent that we process your personal information based on the Weighing Rules, this treatment will be motivated only by legitimate interests such as:

- > Handling of contracts and agreements entered into
- > Fulfillment of payment and collection obligations
- > Organization of social and professional events and other activities
- > Exchange of personal information between customers and consultants as part of the company's primary purpose; to act as a sales company and network for independent consultants.

b) Treatment according to legal requirements

Flextribe is required by law to obtain and record a variety of information from and to public authorities such as Police and Tax

a) Consent

Have you consented to a treatment, such as When receiving newsletters and invitations to events, Flextribe processes your information relevant to this. If we obtain your consent, you will voluntarily agree, and you may withdraw your consent at any time by notifying us.

6) Disclosure of your personal information

In connection with the operation and administration of Flextribe, the disclosure of relevant information is provided to business partners and suppliers that perform system operations / hosting, maintenance of the company's business systems, auditing and accounting.

In addition, necessary information is provided to public authorities, including TAX and POLITI. If it follows from a court order or legal basis in other legislation.

Flextribe does not disclose any personal information to other persons or companies for marketing purposes.

Flextribe does not disclose personal information to persons or companies to third countries or outside the EU.

7) Storing and deleting your personal information

General personal data will be deleted as a rule no later than three years after termination of use, unless for accounting or legal reasons there is a need to extend the time period or the registrant requests this before that date.

8) Your rights

You have several special rights when we process personal information about you:

- > The right to be informed about the processing of data
- > The right to access personal data
- > The right to rectification
- > The right to delete
- > The right to limit treatment
- > The right to data portability (data delivery in a commonly used format)
- > The right of objection

You may make use of your rights, including objections to our treatment, by contacting us. You can find our contact information at the top.

You can complain about the processing of information and data regarding you. Complaints submitted to Datatilsynet, Borgergade 28, 5, 1300 København K, Tlf. 33 19 32 00

9) Revision of privacy policy

We may make changes to this privacy policy on an ongoing basis. Changes will change the date at the top of the privacy policy. The current privacy policy will be available on our website www.flextribe.dk