

Altoros Privacy Policy

1. Introduction

Altoros is committed to protecting the privacy rights of data subjects.

“Altoros”, “we,” and “us” refer to Altoros Americas LLC, Altoros Norge, Altoros A.S., and Altoros Poland. (Check out our [contact information](#)). We offer a wide range of software development services. We refer to all of these products, together with our other services and websites as “Services” in this policy.

This policy refers to the data we collect when you use our services or communicate with us. Examples include visiting our website, downloading our white papers and other materials, responding to our e-mails, and attending our events. This policy also explains your rights with respect to data we collect about you. Data privacy of our employees is regulated in separate local act and is not regulated by this policy.

Your information is controlled by Altoros. If you have any questions or concerns about how your information is handled, please direct an inquiry to us at dpo@altoros.com. Alexey Lekontsev is our Data Protection Officer (DPO), with overall responsibility for the day-to-day implementation of this policy.

If you do not agree with this policy, please do not access or use our services, or interact with any other aspect of our business.

2. Data we gathered from our website’s users

When you visit our website, we collect usage statistics and other data, which helps us to estimate the efficiency of the content delivered. Processing data gathered from our website also helps us to provide better user experience and improve the products and services we

offer. We collect information through the use of “cookies,” scripts, tags, Local Shared Objects (Flash cookies), web beacons, and other related methods.

2.1. We collect the following categories of data:

- Cookies and similar technologies (e.g., web beacons, pixels, ad tags and device identifiers)
- Usage data, user behavior collected by cookies

What is a cookie?

HTTP cookie is a small piece of data that we send to your browser when you visit our website. After your computer accepts it or “takes the cookie” it is stored on your computer as an identification tag. Cookies are generally employed to measure website usage (e.g., a number of visitors and the duration of a visit) and efficiency (e.g., topics of interest to our visitors). Cookies can also be used to personalize a user experience on our website. If necessary, users can turn off cookies via browser settings.

2.2. How we process the data gathered

Altoros and third-party providers we partner with (e.g., our advertising and analytics partners) use cookies and other tracking tools to identify users across different services and devices and ensure better user experience. Please see the list of them below.

2.2.1. Analytics partners

The services outlined below help us to monitor and analyze both web traffic and user behavior.

- **Google Analytics (Google LLC.)** Google Analytics is a web analysis service provided by Google Inc. (Hereinafter in this document referred to as Google). Google utilizes the data

collected to track and examine user behaviour, to prepare reports, and share insights with other Google services. Google may use the data collected to contextualize and personalize the advertisements launched via Google's advertising network. The service is subject to Google's privacy policy. [Google's Privacy Policy](#)

- **Google Tag Manager (Google LLC.)** **Google Tag Manager** is a web service designed to optimize the Google Analytics management process. The service is provided by Google Inc. and is subject to the company's privacy policy. [Google's Privacy Policy](#)
- **Facebook Ads conversion tracking (Facebook, Inc.)** **Facebook Ads conversion tracking** is an analytics service that binds data gathered from the Facebook advertising network with actions performed on Altoros websites. The service is provided by Facebook, Inc. and is subject to the company's privacy policy. [Facebook's Privacy Policy](#)
- **Hotjar (Hotjar Ltd.)** is a web analysis service that records user behavior without collecting private user data. The service provides insights to improving website navigation and addressing customer needs. The service is provided by Hotjar Limited and is subject to the company's privacy policy. [Hotjar's Privacy Policy](#)
- **Albacross (Albacross Nordic AB)** is an account-based marketing platform designed to boost lead generation and advertising efficiency. In terms of personal data collected, Albacross gathers information about the IP-address from which you visited our website. In addition, the service collects technical information that enables Albacross to differentiate between visitors using the same IP-address. Albacross stores the information about a domain—extracted from the form input—to correlate the IP-address with your employer. The service is provided by Albacross Nordic AB and is subject to the company's privacy policy. [Albacross Privacy Policy](#)
- **Google Ads Tools (Google Ads Conversion Tracking/ Dynamic Remarketing / User List / DoubleClick) (Google LLC)** Google Ads conversion tracking and other Google Ads services are analytic instruments, connect data from the Google Ads advertising network

with actions taken on Altoros websites. The services are provided by Google Inc. and are subject to the company's privacy policy. [Google's Privacy Policy](#)

- **Dealfront (Dealfront Group GmbH)** provides a website visitor tracking and lead generation service. They analyze website traffic using domains, locations, IP addresses, and contacts to reveal what companies visitors work for. This data is used to identify potential sales leads, notify when target accounts visit the website, and enrich CRM records. Dealfront may access non-identifying website visitor data to provide the service. They self-declare to be compliant with GDPR. [Dealfront's Privacy Notice](#) applies to the data they collect and process.

2.2.2. Advertising partners

User data may be employed to customize advertising deliverables, such as banners and any other types of advertisements to promote our services. Sometimes, these marketing deliverables are developed based on user preferences. However, not all personal data is used for this purpose. Some of the services provided by Altoros may use cookies to identify users. The behavioral retargeting technique may also be used to display advertisements tailored to user preferences and online behavior, including outside Altoros websites. For more information, please check the privacy policies of the relevant services.

- **Facebook Audience Network (Facebook, Inc.)** Facebook Audience Network is an advertising service that helps to monitor and evaluate the efficiency of advertising campaigns launched via Facebook. The service is provided by Facebook, Inc. and is subject to the company's privacy policy. [Facebook's Privacy Policy](#)
- **Microsoft Ads (Microsoft Corporation).** Microsoft Ads is an advertising for launching and managing advertising campaigns across Bing search and Bing's partner network. The service is provided by Microsoft Corporation and is subject to the company's privacy policy. [Microsoft Corporation's Privacy Policy](#)

- **Google Ads (Google LLC) DoubleClick (Google Inc.) / DoubleClick Bid Manager / Google DoubleClick Google Ads and Double Click** are advertising services that enable efficient interaction with potential customers by suggesting relevant advertisements across Google Search, as well as Google's partner networks. Google Ads and Double Click are easily integrated with any other Google services—for example, Google Analytics—and help to process user data gathered by cookies. The services are provided by Google Inc. and are subject to the company's privacy policy. [Google's Privacy Policy](#)
- **LinkedIn Marketing Solutions / LinkedIn Ads (LinkedIn Corporation) LinkedIn Ads** allows for tracking the efficiency of advertising campaigns launched via LinkedIn. The service is provided by LinkedIn Corporation and is subject to the company's privacy policy. [LinkedIn's Privacy Policy](#)
- **Twitter Advertising / Twitter Conversion Tracking (Twitter, Inc.)** The Twitter Ads network allows for tracking the efficiency of advertising campaigns launched via Twitter. The service is provided by Twitter Inc. and is subject to the company's privacy policy. [Twitter's Privacy Policy](#)

2.2.3. Other widgets and scripts provided by partner third parties

In addition to advertising partners and analytics partners mentioned above, we are using widgets, which act as an intermediary between third-party websites (Facebook, Twitter, LinkedIn, etc.) and our website and allow us to provide additional information about us or our services or authorize you as our website user to share content on third-party websites.

- **Disqus (Disqus, Inc.)** is a blog comment hosting service for websites and online communities that use a networked platform. Disqus integration into a corporate blog enables website users to submit a comment to any article posted on the blog after he/she authorizes into a personal Disqus account. [Disqus Privacy Policy](#)

- **WordPress (WordPress.org)** is a free and open-source content management system (CMS). WordPress Stats is the CMS's analytics module, which gathers the following statistics: views and unique visitors, likes, followers, references, location, terms, words, and phrases people use on search engines (e.g., Google, Yahoo, or Bing) to find posts and pages on our website. The service also allows for gathering such data as clicks on external link, cookies, etc. The service is subject to [WordPress privacy policy](#).
- **Twitter Button and Twitter Syndication (Twitter, Inc.)** allows you to quickly share the webpage you are viewing with all of your followers. Twitter Syndication enables users to implement a widget, which gathers information about the company's Twitter profile and tweets. The services are provided by Twitter Inc. and are subject to the company's privacy policy. [Twitter's Privacy Policy](#)
- **Facebook Social Graph (Facebook, Inc.)** is used to implement widgets to get data into and out of the Facebook platform. In our case, this widget is used to enable content sharing and display the number of sharings by Facebook users. The service is provided by Facebook, Inc. and is subject to the company's privacy policy. [Facebook's Privacy Policy](#)
- **LinkedIn Widgets (LinkedIn Corporation)** are a quick way to infuse LinkedIn functionality into our website. We use this widget to enable content sharing and display the number of sharings by LinkedIn users. The service is provided by LinkedIn Corporation and is subject to the company's privacy policy. [LinkedIn's Privacy Policy](#)
- **OneSignal (OneSignal, Inc)** is a push notification service. [OneSignal's Privacy Policy](#)
- **ShareThis (ShareThis, Inc.)** is a share button service. [ShareThis Privacy Policy](#)
- **AddThis (acquired by Oracle)** is a share button service. [AddThis Privacy Policy, Oracle Privacy Policy](#)
- **Wistia (Wistia, Inc.)** is a video hosting platform used at Altoros to store videos shot at events organized by our company to be further embedded on our corporate blog. [Wistia's Privacy Policy](#)

- **Tawk (Tawk.to inc.)** is a live chat app. [Tawk's Privacy Policy](#)

2.3. Purposes and legal basis for data processing

Altoros is gathering data via this service with a view to improve the development of our products or services. Data gathering is conducted on the basis of our or third party's legitimate interests, or with your consent.

User data collected allow Altoros to provide our Services and is employed in a variety of our activities which correspond our legitimate interest, including:

- enabling analytics to draw valuable insights for smart decision making
- contacting users
- managing a user database
- enabling commenting across the content delivered
- handling payments
- preventing spam
- improving user experience (e.g., delivering highly personalized content suggestions) and the services delivered (e.g., a subscription service), etc.
- providing information related to the changes introduced to our Customer Terms of Service, Privacy Policy (including the Cookie Policy), or other legal agreements

2.4. Data retention period

We set a retention period for your data—collected from our websites—to 7 years. We gather data to improve our services and the products we deliver. The retention period from our partners is set forth by them in their privacy policies.

2.5. Data recipients

We do not transfer the gathered data to third parties, apart from the cases described in General data processing section or in this Section, as well as cases stipulated in our third partners privacy policies.

3. Data we gather from our web forms

3.1. We collect the following categories of data

When you fill out any of the forms located at our websites, you share the following information with us:

- Name/surname
- Position
- Phone number
- E-mail
- Location
- Company name
- Any other information you provided to us from your request

3.2. How we process the data gathered

The information about the request is transferred to our CRM. Later, it may be used to contact you with something relevant to your initial request, provide further information related to the topic you requested, and deliver quality service.

By sharing personal information with us, you are giving consent for us to rightfully use your data for the following business purposes:

- Send any updates regarding services you have shown interest in or provide further information related to the topic you requested.
- Contact and communicate with you regarding your initial request.
- to get your consent to further contact you regarding any other services you might be interested in.

All the information gathered via contact forms is processed by the following services:

- WordPress ([Privacy Policy](#))
- Gmail services that deliver notifications about the filled out contact forms to our employees ([Privacy Shield](#))

3.3. Purposes and legal basis for data processing

1) If you fill out a contact form to get an expert's take on your project or to get familiar with the services our company delivers, we process your data in order to **enter into a contract and to comply with our contractual obligations** (to render Services), or answer to your request. This way, we may use your personal information to provide services to you, as well as process transactions related to the services you inquired from us. For example, we may use your name or an e-mail address to send an invoice or to establish communication throughout the whole service delivery life cycle. We may also use your personal information you shared with us to connect you with other of our team members seeking your subject matter expertise. In case you use multiple services offered by our company, we may analyze your personal information and your online behavior on our resources to deliver an integrated experience. For example, to simplify your search across a variety of our services

to find a particular one or to suggest relevant product information as you navigate across our websites.

2) With an aim to enhance our productivity and improve our collaboration—**under our legitimate interest**—we may use your personal data (e.g., an an e-mail, name, job title, or activity taken on our resources) to provide information we believe may be of interest to you. Additionally, we may store the history of our communication for the legitimate purposes of maintaining customer relations and/or service delivery.

3) If you fill out contact forms for any other purpose, including the download of white papers or to request a demo, we process data with a **legitimate interest** to prevent spam and restrict direct marketing of third-party companies. Our interactions are aimed at driving engagement and maximizing value you get through our services. These interactions may include information about our new commercial offers, white papers, newsletters, content, and events we believe may be relevant to you.

3.4. Data retention period

We set a retention period for your data collected from contact forms on our websites to 8 years. This data may be further used to contact you if we want to send you anything relevant to your initial request (e.g., updated information on the white papers you downloaded from our websites).

3.5. Data recipients

We do not transfer data to third parties, apart from the cases described in the General data processing section and this section.

4. Data we gather from our chatbot

4.1. We collect the following categories of data

When you interact with us via any other means and tools, we gather the following information about you:

- Name/surname
- Position
- Phone number
- E-mail
- Skype ID
- Location
- Company name
- Any other information you provided to us from your request

4.2. How we process the data gathered

The information gathered is transferred to our CRM. Later, it may be used to contact you with something relevant to your initial request, provide further information related to the topic you requested, and deliver quality service.

By sharing personal information with us, you are giving consent for us to rightfully use and process in any way your data, including **for the following business purposes**:

- Send any updates regarding services you have shown interest in or provide further information related to the topic you requested.
- Contact and communicate with you regarding your initial request.

- To get your consent to further contact you regarding any other services you might be interested in.
- Maintenance and support activities of our CRM system and related activities, etc.

All the information gathered via chatbot is processed by the following services:

- WordPress ([Privacy Policy](#))
- Gmail services that deliver notifications about the filled out contact forms to our employees ([Privacy Shield](#))
- Drift.com, Inc. ([Privacy Shield](#))

4.3. Purposes and legal basis for data processing

1) If you share personal data via chatbot to get an expert's take on your project or to get familiar with the services our company delivers, we process your data in order **to enter into a contract and to comply with our contractual obligations** (to render Services), or answer to your request. This way, we may use your personal information to provide services to you, as well as process transactions related to the services you inquired from us. For example, we may use your name or an e-mail address to send an invoice or to establish communication throughout the whole service delivery life cycle. We may also use your personal information you shared with us to connect you with other of our team members seeking your subject matter expertise. In case you use multiple services offered by our company, we may analyze your personal information and your online behavior on our resources to deliver an integrated experience. For example, to simplify your search across a variety of our services to find a particular one or to suggest relevant product information as you navigate across our websites.

2) With an aim to enhance our productivity and improve our collaboration — **under our legitimate interest** — we may use your personal data (e.g., an an e-mail, name, job title, or

activity taken on our resources) to provide information we believe may be of interest to you. Additionally, we may store the history of our communication for the legitimate purposes of maintaining customer relations and/or service delivery, as well as we may maintain and support the system, in which we store collected data.

3) If you share personal data via chatbot for any other purpose we process data **with a legitimate interest** to prevent spam and restrict direct marketing of third-party companies. Our interactions are aimed at driving engagement and maximizing value you get through our services. These interactions may include information about our new commercial offers, white papers, newsletters, content, and events we believe may be relevant to you.

4.4. Data retention period

We set a retention period the data collected to 8 years. This data may be further used to contact you if we we want to send you anything relevant to your initial request.

4.5. Data recipients

We do not transfer data to third parties, apart from the cases described in the General data processing section and this section.

5. Data we gather via e-mails, messengers, widgets, and phones

5.1. We collect the following categories of data

When you interact with us via any other means and tools, we gather the following information about you:

- Names/surname
- Position
- Phone number
- E-mail
- Location
- Skype ID
- Company name
- Any other information you provided to us from your request
- History of our communication, call duration

The information about a customer call is stored in our internal system and includes a full call recording (starting the moment a connection was established), a voice recording if any available, a phone number, and a call duration.

5.2. How we process the data gathered

All the requests acquired via e-mail are stored within a business Gmail account of Altoros located at the Google's server. The information about the request is further transferred and stored in internal CRM either by employees of Altoros manually or automatically for further processing according to our purposes. We may maintain and support the system, in which we store collected data.

5.3. Purposes and legal basis for data processing

1) When you contact us via any other means to get an expert's take on your project / our services or to make any kind of a request, we process your data in order to enter into a contract, to comply with our **contractual obligations** (to render Services), or answer to your request.

2) This way, we may use your personal information to provide services to you, as well as process transactions related to the services you inquired from us. For example, we may use your name or an e-mail address to send an invoice or to establish communication throughout the whole service delivery life cycle. We may also use your personal information you shared with us to connect you with other of our team members seeking your subject matter expertise. In case you use multiple services offered by our company, we may analyze your personal information and your online behavior on our resources to deliver an integrated experience. For example, to simplify your search across a variety of our services to find a particular one or to suggest relevant product information as you navigate across our websites. With an aim to enhance our productivity and improve our collaboration, **what is our legitimate interest**, we may use your personal data—such as an e-mail, name, job title, or activity taken on our resources—to provide information we believe may be of interest to you. Additionally, we may store the history of our communication for the legitimate purposes of maintaining customer relations and/ or service delivery.

3) If you communicate with us for any other purpose we process data with a **legitimate interest** to prevent spam and restrict direct marketing of third-party companies. Our interactions are aimed at driving engagement and maximizing value you get through our services. These interactions may include information about our new commercial offers, white papers, newsletters, content, and events we believe may be relevant to you or your initial request

5.4. Data retention period

We set a retention period the data collected to 6 years. This data may be further used to contact you if we we want to send you anything relevant to your initial request.

5.5. Data recipients

We do not share data with third parties, apart from the cases described in the General data processing section and cases stipulated in our third partners privacy policies.

6. Data we gather if you are our customer

6.1. We collect the following categories of data

If you are our customer, you have already shared the following information with us to process:

- Names/surnames of contact persons
- Positions in company
- Phone numbers
- E-mails
- Skype IDs
- LinkedIn profile links
- Company name/address
- Any other information you provided to us during service delivery
- History of our communication, etc.

6.2. How we process the data gathered

1) Information about the existing customers is transferred to our internal CRM (by our employees manually or automatically on receiving a contact form) for further processing a customer request and providing relevant services, as well as developing recommendations on improving the services we deliver. We may further needed any maintenance and support activities of our CRM system or any related activities.

2) To share contact information and information related to the services a customer is interested in, we may use the following messengers: Skype ([Privacy Policy](#)), Viber ([Privacy Policy](#)), WhatsApp ([Privacy Policy](#)), or Telegram ([Privacy Policy](#)), as well as e-mail services—Gmail ([Privacy Policy](#)) or Outlook ([Privacy Policy](#)).

3) To store and share project requirements or any other information submitted by a customer (e.g., a project budget estimation to deliver a suitable commercial offer, UI mockups submitted by a customer, test access to a customer system, etc.), we may use services of Google ([Privacy Policy](#)), Adobe ([Privacy Policy](#)), Microsoft Office ([Privacy Policy](#)), Atlassian ([Privacy Policy](#)), and Trello ([Privacy Policy](#)).

4) To provision phone calls in a distributed manner, Altoros makes use services store historical data about the activities conducted.

5) To establish internal business processes within our departments and teams and to ensure timely request processing, we make use of Trello ([Privacy Policy](#)) and Atlassian ([Privacy Policy](#)). These services may store project information related to a technology stack, budget, roadmap and deadlines, Altoros project team, etc.

6) To store audio recording of negotiations with a customer in order to clarify details if necessary and conduct meetings with previous, existing, and potential customers, we

makes use of GoToMeeting ([Privacy Policy](#)), Hangouts ([Privacy Policy](#)) or Zoom ([Privacy Policy](#)).

7) To store case studies, describing a delivered project approved by a customer, we use an internal web portal—SharePoint Portal ([Privacy Policy](#)) — which only employees of Altoros can access.

8) To provision contracts, all the data about the active customers is stored in a secured internal network resource with limited access. This resource is available only to our account managers or other employees concerned for the purpose of improving service delivery while establishing communication with a customer, issuing an invoice, and generating reports for a customer. Additional services Altoros uses for issuing invoices Azets AS ([Privacy Policy](#)). These services process data in compliance with privacy policies of the mentioned services.

9) Additionally, by sharing with us this information you are giving consent to contact you in order to get your consent for a possibility to contact you regarding any other services you might be interested in.

6.3. Purposes and legal basis for data processing

1) To fulfill / comply with **our contractual obligations** or answer to your request. For example, we use your name or an e-mail in contact to send invoice or communicate with you at any stage of the service delivery life cycle. This way, we may use your personal information to provide services to you, as well as process transactions related to the services you inquired from us. For example, we may use your name or an e-mail address to send an invoice or to establish communication throughout the whole service delivery life cycle. We may also use your personal information you shared with us to connect you with other of our team members seeking your subject matter expertise. In case you use multiple services offered by our company, we may analyze your personal information and your online behavior on our resources to deliver an integrated experience. For example, to

simplify your search across a variety of our services to find a particular one or to suggest relevant product information as you navigate across our websites.

2) With an aim to enhance our productivity and improve our collaboration, what is **our legitimate interest**, we may use your personal data—such as an e-mail, name, job title, or activity taken on our resources — to provide information we believe may be of interest to you and communicate with you in order to get your consent for a possibility to contact you regarding any other services you might be interested in. Additionally, we may store the history of our communication for the legitimate purposes of maintaining customer relations and/or service delivery as well as to maintain and support our CRM system and related activities.

6.4. Data retention period

We set retention period for your data about our customer to 6 years from last Service delivery. We keep it to be able to reach you when we have something relevant to your initial request (for example, updated information on related services, news, events, updates, etc).

6.5. Data recipients

We do not share data with third parties, apart from the cases described in the General data processing section or in this section.

7. Data we gather from the attendees of our events

7.1. We collect the following categories of data

When you register or attend an event organized by Altoros, you share the following information with us:

- Names/surnames of contact persons
- Positions in company
- Phone numbers
- E-mails
- Skype IDs
- Company name/address
- Any other information you provided to us during service delivery
- History of our communication, etc.
- Business cards, etc.

7.2. How we process the data gathered

Data about users who filled out a contact form is stored in our internal CRM, which shall be maintained and supported, — by our employees manually or automatically on receiving a contact form — for further processing a customer request and providing relevant services, as well as developing recommendations on improving the services we deliver.

To share contact information, as well as information related to the events and services that may be of interest to a customer, Altoros may use the following:

- Messengers: Skype ([Privacy Policy](#)), Viber ([Privacy Policy](#)), WhatsApp ([Privacy Policy](#)), or Telegram ([Privacy Policy](#))
- E-mail services Gmail ([Privacy Policy](#)) or Outlook ([Privacy Policy](#))
- Social media platforms: LinkedIn ([Privacy Policy](#))

- VOIP phone and conferencing services: GoToMeeting ([Privacy Policy](#)), Hangouts ([Privacy Policy](#)) or Zoom ([Privacy Policy](#)).

To provide users with a possibility to register to an event organized by Altoros and acquire tickets, we use Eventbrite ([Privacy Policy](#)).

To store and share information about attendees of the events organized by Altoros, as well as to improve all the online activities related to such events, Altoros makes use of the services by Google ([Privacy Policy](#)) and Microsoft ([Privacy Policy](#)).

To enable marketing activities and share information about relevant services provided by our company, we use remarketing and advertising instruments available through Google Adwords ([Privacy Policy](#)).

To build a strong community around the events organized by Altoros and to interact with those interested in our services, we use Meetup.com ([Privacy Policy](#)).

To optimize internal processes and improve a communication channels, we may use Atlassian ([Privacy Policy](#)) and Trello ([Privacy Policy](#)).

7.3. Purposes and legal basis for data processing

To establish efficient communication with customers about our services, we may use the following data:

- 1) To fulfill and comply with **our contractual obligations** or answer to your request. To maintain contract development, we use your contact data to send transactional information via e-mail, Skype, or any other communication means or services. Your contact data is also

used to confirm your request, respond to any of your questions, inquiries, or requests, provide support, as well as send you any updates on the services we deliver.

2) **To fulfill our legitimate interest**, we use your contact information and information about your interaction with our services to send promotional materials that we find relevant to you via e-mail, Skype, or any other communication means or services. Our interactions are aimed at driving engagement and maximizing value you get through our services. These interactions may include information about our new events, commercial offers, newsletters, content, and events we believe may be relevant to you. To fulfill our legitimate interest, we use your contact information which is stored at our CRM system in order to maintain and support our CRM system and carry on any related activities.

7.4. Data retention period

We do not share personal data with third parties, apart from the cases, which imply Altoros is to provide a list of registrars to the organizer of the event with a view to ensure an acceptable level of organization and security.

7.5. Data recipients

We set retention period for your data about our customer to 6 years from last event you have been registered. We keep it to be able to reach you when we have something relevant to your initial request (for example, updated information on calls, e-mail, etc.).

8. General data processing and data storage

Our processing means any operation or set of operations which is performed on personal data or on sets of personal data, 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, support, maintenance, etc.

The retention period of storing data varies on its type. As the retention period expires, we either delete or anonymize personal data collected. In case data was transferred to a backup storage and, therefore, cannot be deleted, we continue to store it in a secure fashion, but do not use it for any purpose. In all the other cases, we proceed with the deletion of data.

The information available through our websites that was collected by third parties is subject to the privacy policies of these third parties. In this case, the retention period of storing data is also subject to the privacy policies of these third parties.

To prevent spam, we keep track of spam and swindler accounts, which may be blocked through filtering at the server level.

Request containing words, which may be treated as spam-related or which may promote the distribution of misleading information, are filtered at the server level, as well as by company employees manually.

Data storage on our servers, as well as on cloud services provided by Google, Amazon and on other services, inter alia Drift.com or other stipulated in this policy.

We do not make automated decisions, including profiling.

9. Your rights

Below, you will find a list of the rights you are subject to. Please note that some of the enlisted rights may be limited for the requests, which expose personal information of another individual who is subject to the very same rights for privacy. In such a case, we will

not be able to satisfy your request for data deletion if it contains information we are eligible to keep by law.

- 1. The right to be informed and to access information.** You have legal rights to access your personal data, as well as request if we use this data for any purpose. Complying with our general policy, we will provide you with a free copy of your personal information in use within a month after we receive your request. We will send your information in use via a password-protected PDF file. For excessive or repeated requests, we are eligible to charge a fee. In case of numerous or complex requests, we are eligible to prolong our response time by as much as two additional months. Under such circumstances, you will be informed about the reasons of these extensions. In case, we refuse to address a particular request, we will explain why it happens and provide you with a list of further actions you are eligible to proceed. If shall you wish to take further action, we will require two trusted IDs from you to prove your identity. You may **forward your requests** to our Data Protection Officer (dpo@altoros.com). Please provide information about the nature of your request to help us process your enquiry.
- 2. The right for rectification.** In case you believe, we store any of your personal data, which is incorrect or incomplete, you may request us to correct or supplement it. You also have the right to introduce changes to your information by logging into your account with us.
- 3. The right to erase, or “the right to be forgotten.”** Under this principle, you may request us to delete or remove your personal data if there is no solid reason for your data continued processing. If you would like us to remove you from our database, please e-mail dpo@altoros.com. The right to be forgotten may be brought into force under the following reasons:

- Data, which no longer has a relation to its original purpose for collection.
 - You withdraw consent with respect to the original reason data was processed under, and there is no other reason for us to continue to store and process your personal data.
 - You have objections to processing your personal data, and there are no overriding legitimate reasons for us to continue to process it.
 - Your personal data has been unlawfully processed.
 - Your personal data has to be deleted to comply with a legal obligation in a European Union or a Member State law to which Altoros is subject.
 - Your personal data has been collected in relation to the offer of information society services.
4. **The right to restrict processing.** Under this right, you may request us to limit processing your personal data. In this regard, we are eligible to store information that is sufficient to identify which data you want to be blocked, but cannot process it further. The right to restrict processing applies to the following cases:
- Where you contest the accuracy of your personal data, we will restrict data processing until we have verified the accuracy of your personal data.
 - Where you have objected to data processing under legitimate interests, we will consider whether our legitimate interests override yours.
 - When data processing is unlawful, and you oppose data deletion and request restriction instead.
 - If we no longer need your personal data, but you require this data to establish, exercise, or defend a legal claim.
5. If we have disclosed your personal data in question to third parties, we will inform them about the restriction on data processing, unless it is impossible or involves disproportionate effort to do so. We will inform you if we decide to lift a restriction on data processing.

6. **The right to object.** You are eligible to object to processing your personal data based on legitimate interests (including profiling) and direct marketing (including profiling). The objection must be on “grounds relating to his or her particular situation.” We will inform you of your right to object in the first communication you receive from us. We will stop processing your personal data for direct marketing purposes, as soon as we receive an objection.
7. **The right to data portability.** You are eligible to obtain your personal data, which is processed by Altoros, to use it for your own purposes. It means you have the right to receive your personal data—that you have shared with us—in a structured machine readable format, so you can further to transfer the data to a different data controller. This right applies in the following circumstances:
 - Where you have provided the data to Altoros.
 - Where data processing is carried out, because you have given Altoros your consent to do so.
 - Where data processing is carried out to develop a contract between you and Altoros.
 - Where data processing is carried out automatically. (No membership data is processed using automated means, so this right does not apply).
8. **Withdrawal of consent.** If we process your personal data based on your consent (as indicated at the time of collection of such data), you have the right to withdraw your consent at any point in time. Please note, that if you exercise this right, you may have to then provide your consent on a case-by-case basis for the use or disclosure of certain personal data, if such use or disclosure is necessary to enable you to utilize some or all of our services.

9. **Right to file a complaint.** You have the right to file a complaint about manipulations applied to your data by Altoros with the supervisory authority of your country or a European Union Member State.

10. Data security and protection

We use data hosting service providers in the United States and Ireland to store the information we collect, and we do use extra technical measures to secure your data.

These measures include without limitation: data encryption, password-protected access to personal information, limited access to sensitive data, encrypted transfer of sensitive data (HTTPS, IPSec, TLS, PPTP, and SSH) firewalls and VPN, intrusion detection, and antivirus on all the production servers.

The data collected by third party providers is protected by them and is subject to their terms and privacy policies.

The data collected on our websites by Altoros, as well as the data, which you entrust us under NDAs and contracts, is protected by us. We follow the technical requirements of GDPR and ensure security standards are met without exception.

Though we implement safeguards designed to protect your information, no security system is impenetrable and due to the inherent nature of the Internet, we cannot guarantee that data is absolutely safe from intrusion by others during transmission through the Internet, or while stored on our systems, or otherwise in our care.

11. Data transfer outside EEA

We collect information worldwide and primarily store this information in the United States and Ireland. We transfer, process, and store your information outside of your country of

residence across regions wherever we or our third-party service providers operate for the purpose of delivering our services to you. Whenever we transfer your information, we take precaution measures to protect it. Thus, the data by third party providers may be transferred to different countries globally for processing. These data transfers fall under the terms and privacy policies of these providers.

The data collected by Altoros may be transferred across our offices. Headquartered in the USA, Altoros is an international company with offices in Norway, Finland, Argentina (there is adequacy decision of the European Commission), and Poland. Some countries may not have equivalent privacy and data protection laws as the laws of many of the countries where our customers and users are based. When we share information about you within and among Altoros branches, we make use of standard contractual data protection clauses.

12. General description

We may supplement or amend this policy by additional policies and guidelines from time to time. We will post any privacy policy changes on this page. We encourage you to review our privacy policy whenever you use our services to stay informed about our data practices and the ways you can help to protect your privacy.

Our services are not directed to individuals under 16. We do not knowingly collect personal information from individuals under 16. If we become aware that an individual under 16 has provided us with personal information, we will take measures to delete such information.

If you disagree with any changes to this privacy policy, you will need to stop using our services.

Contact us

Your information is controlled by Altoros Americas LLC and Altoros Norge AS. If you have questions or concerns about how your information is handled, please direct your inquiry to Altoros Norge AS, which we have appointed as responsible for facilitating such inquiries or, if you are a resident of the European Economic Area, please contact our EU Representative.

EEA Representative:

Altoros Norge AS.

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