

Privacy Policy

1. Interpretation and Definitions

1.1 Interpretation

The words of which the initial letter is capitalized have meanings defined under the following conditions. The following definitions shall have the same meaning regardless of whether they appear in singular or in plural.

1.2 Definitions

For the purposes of this Privacy Policy:

You means the individual accessing or using the Services, or the company, or other legal entity on behalf of which such individual is accessing or using the Services, as applicable.

Under GDPR (General Data Protection Regulation), You can be referred to as the Data Subject or as the User as you are the individual using the Services.

- Company (referred to as either “the Company”, “We”, “Us” or “Our” in this Agreement) refers to: Tricent Security Group A/S, Meldahls­gade 3, Mezzanin, DK-1613 Copenhagen V, Denmark. For the purpose of the GDPR, the Company is the Data Controller.
- Application means the software programs, provided by the Company accessed by You on any electronic device, named Tricent for Microsoft 365 and Tricent for Google Workspace.
- Affiliate means an entity that controls, is controlled by or is under common

control with a party, where “control” means ownership of 50% or more of the shares, equity interest or other securities entitled to vote for election of directors or other managing authority.

- Account means a unique account created for You to access our Services or parts of our Services.
- Services refers to the website.
- Country refers to: Denmark
- Service Provider means any natural or legal person who processes the data on behalf of the Company. It refers to third-party companies or individuals employed by the Company to facilitate the Services, to provide the Services on behalf of the Company, to perform services related to the Services or to assist the Company in analyzing how the Services are used. For the purpose of the GDPR, Service Providers are considered Data Processors.
- Third-party Social Media Service refers to any website or any social network website through which a User can log in or create an account to use the Services.
- Personal Data is any information that relates to an identified or identifiable individual.

For the purposes for GDPR, Personal Data means any information relating to You such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity. For the purposes of the CCPA, Personal Data means any information that identifies, relates to, describes or is capable of being associated with, or could reasonably be linked, directly or indirectly, with You.

- Device means any device that can access the Services such as a computer, a cellphone or a digital tablet.
- Usage Data refers to data collected automatically, either generated by the use of the Services or from the Services' infrastructure itself (for example, the duration of a page visit).
- Data Controller, for the purposes of the GDPR (General Data Protection Regulation), refers to the Company as the legal person which alone or jointly with others determines the purposes and means of the processing of Personal Data.
- Do Not Track (DNT) is a concept that has been promoted by US regulatory authorities, in particular the U.S. Federal Trade Commission (FTC), for the Internet industry to develop and implement a mechanism for allowing internet users to control the tracking of their online activities across websites.
- Business, for the purpose of the CCPA (California Consumer Privacy Act), refers to the Company as the legal entity that collects Consumers' personal information and determines the purposes and means of the processing of Consumers' personal information, or on behalf of which such information is collected and that alone, or jointly with others, determines the purposes and means of the processing of consumers' personal information, that does business in the State of California.
- Consumer, for the purpose of the CCPA (California Consumer Privacy Act), means a natural person who is a California resident. A resident, as defined in the law, includes (1) every individual who is in the USA for other than a temporary or transitory purpose, and (2) every individual who is

domiciled in the USA who is outside the USA for a temporary or transitory purpose.

- Sale, for the purpose of the CCPA (California Consumer Privacy Act), means selling, renting, releasing, disclosing, disseminating, making available, transferring, or otherwise communicating orally, in writing, or by electronic or other means, a Consumer's Personal information to another business or a third party for monetary or other valuable consideration.

2. Collecting and Using Your Personal Data

2.1 Types of Data Collected

Personal Data

While using Our Services, We may ask You to provide Us with certain personally identifiable information that can be used to contact or identify You. Personally identifiable information may include, but is not limited to:

- Email address
- First name and last name
- Bank account information in order to pay for products and/or services within the Services
- Usage Data

When You pay for a product and/or a service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify Your identity.

Such information may include, without limitation:

- Date of birth
- Passport or National ID card
- Bank card statement
- Other information linking You to an address

Usage Data

Usage Data is collected automatically when using the Services.

Usage Data may include information such as Your Device's Internet Protocol address (e.g. IP address), browser type, browser version, the pages of our Services that You visit, the time and date of Your visit, the time spent on those pages, unique device identifiers and other diagnostic data.

When You access the Services by or through a mobile device, We may collect certain information automatically, including, but not limited to, the type of mobile device You use, Your mobile device's unique ID, the IP address of Your mobile device, Your mobile operating system, the type of mobile Internet browser You use, unique device identifiers and other diagnostic data.

We may also collect information that Your browser sends whenever You visit our Services or when You access the Services by or through a mobile device.

2.2 Tracking Technologies and Cookies

We use Cookies and similar tracking technologies to track the activity on Our Services and store certain information. Tracking technologies used are beacons, tags, and scripts to collect and track

information and to improve and analyze Our Services.

You can instruct Your browser to refuse all Cookies or to indicate when a Cookie is being sent. However, if You do not accept Cookies, You may not be able to use some parts of our Services.

Cookies can be "Persistent" or "Session" Cookies. Persistent Cookies remain on your personal computer or mobile device when You go offline, while Session Cookies are deleted as soon as You close your web browser.

Learn more about our cookies here:

Analytics

We will store data in an aggregated form about visitors and their experiences on our website. We use this data to fix bugs and improve the experience for all visitors.

Conversion tracking

We will store data about when you complete certain actions on our website to understand better how you use it. We use this data to improve your experience with our site.

Marketing automation

We will store data to create marketing campaigns for certain groups of visitors.

Remarketing

We will store data to show you our advertisements (only ours) on other websites relevant to your interests.

3. Use of Your Personal Data

3.1 We may use Personal Data for the following purposes:

- To provide and maintain our Services, including to monitor the usage of our Services.
- To manage Your Account: to manage Your registration as a user of the Services. The Personal Data You provide can give You access to different functionalities of the Services that are available to You as a registered User.
- For the performance of a contract: the development, compliance and undertaking of the purchase contract for the products, items or services You have purchased or of any other contract with Us through the Services.
- To contact You: To contact You by email, telephone calls, SMS, or other equivalent forms of electronic communication, such as a mobile application's push notifications regarding updates or informative communications related to the functionalities, products or contracted services, including the security updates, when necessary or reasonable for their implementation.
- To provide You with news, special offers and general information about other goods, services and events which we offer that are similar to those that you have already purchased or enquired about unless You have opted not to receive such information.
- To manage Your requests: To attend and manage Your requests to Us.

3.2 We may share your personal information in the following situations:

- With Service Providers: We may share Your personal information with Service Providers to monitor and analyze the use of our Services, for payment processing, to contact You.
- For Business transfers: We may share or transfer Your personal information in connection with, or during negotiations of, any merger, sale of Company assets, financing, or acquisition of all or a portion of our business to another company.
- With Affiliates: We may share Your information with Our affiliates, in which case we will require those affiliates to honor this Privacy Policy. Affiliates include Our parent company and any other subsidiaries, joint venture partners or other companies that We control or that are under common control with Us.
- With Business partners: We may share Your information with Our business partners to offer You certain products, services or promotions.
- With other users: when You share personal information or otherwise interact in the public areas with other users, such information may be viewed by all users and may be publicly distributed outside. If You interact with other users or register through a Third-Party Social Media Service, Your contacts on the Third-Party Social Media Service may see Your name, profile, pictures and description of Your activity. Similarly, other users will be able to view descriptions of Your activity, communicate with You and view Your profile.

3.3 Retention of Your Personal Data

We will retain Your Personal Data only for as long as is necessary for the purposes set out in this Privacy Policy. We will retain and use Your Personal Data to the extent necessary to comply with our legal obligations (for example, if we are required to retain your data to comply with applicable laws), resolve disputes, and enforce our legal agreements and policies.

We will also retain Usage Data for internal analysis purposes. Usage Data is generally retained for a shorter period of time, except when this data is used to strengthen the security or to improve the functionality of Our Services, or We are legally obligated to retain this data for longer time periods.

3.4 Transfer of Your Personal Data

Your information, including Personal Data, is processed at Our operating offices and in any other places where the parties involved in the processing are located. It means that this information may be transferred to — and maintained on — computers located outside of Your state, province, country or other governmental jurisdiction where the data protection laws may differ than those from Your jurisdiction.

Your consent to this Privacy Policy followed by Your submission of such information represents Your agreement to that transfer.

We will take all steps reasonably necessary to ensure that Your data is treated securely and in accordance with this Privacy Policy and no transfer of Your Personal Data will take place to an organization or a country unless there are adequate controls in place

including the security of Your data and other personal information.

4. Disclosure of Your Personal Data

Business Transactions

If the Company is involved in a merger, acquisition or asset sale, Your Personal Data may be transferred. We will provide notice before Your Personal Data is transferred and becomes subject to a different Privacy Policy.

Law enforcement

Under certain circumstances, We may be required to disclose Your Personal Data if required to do so by law or in response to valid requests by public authorities (e.g. a court or a government agency).

Other legal requirements

We may disclose Your Personal Data in the good faith belief that such action is necessary to:

- Comply with a legal obligation
- Protect and defend the rights or property of the Company
- Prevent or investigate possible wrongdoing in connection with the Services
- Protect the personal safety of Users of the Services or the public
- Protect against legal liability

Security of Your Personal Data

The security of Your Personal Data is important to Us, but remember that no method of transmission over the Internet, or method of electronic storage is 100% secure. While We strive to use commercially

acceptable means to protect Your Personal Data, We cannot guarantee its absolute security.

5. Detailed Information on the Processing of Your Personal Data

Service Providers have access to Your Personal Data only to perform their tasks on Our behalf and are obligated not to disclose or use it for any other purpose.

5.1 Analytics

We may use third-party Service providers to monitor and analyze the use of our Services.

Piwik PRO and Google Analytics

We use Piwik PRO and Google Analytics as web analytics services to track and report website traffic. The services use the data collected to track and monitor the use of our Services. You may opt out of certain tracking and advertising technologies by refusing one or more cookies in the cookie acceptance interface.

HubSpot

We use HubSpot to collect information about the users and their activity on the website.

The information is used to track and analyze user behaviour and to deliver targeted advertising.

Hotjar

We use Hotjar to track and analyze visitors' behaviour on the website.

Leadfeeder

We use Leadfeeder to collect and match IP addresses to company names.

5.2 Email Marketing

We may use Personal Data that you have submitted to us in connection with e.g. signing up for our newsletter or downloading an eBook to contact You with newsletters, marketing or promotional materials and other information that may be of interest to You.

You may opt-out of receiving any, or all, of these communications from Us by following the unsubscribe link or instructions provided in any email We send or by contacting Us.

We use HubSpot to manage and send emails to You.

5.3 Behavioural Remarketing

We use these remarketing services to advertise on third party websites to You after You visited our Services.

- Meta
- Google
- LinkedIn
- Twitter
- Reddit
- Google

5.4 Payments

We may provide paid products and/or services within the Services.

In that case, we may use third-party services for payment processing (e.g. payment processors).

We will not store or collect Your payment card details. That information is provided directly to Our third-party payment processors whose use of Your personal information is governed by their Privacy Policy. These payment processors adhere to the standards set by PCI-DSS as managed by the PCI Security Standards Council, which is a joint effort of brands like Visa, Mastercard, American Express and Discover. PCI-DSS requirements help ensure the secure handling of payment information.

When You use Our Services to pay a product and/or service via bank transfer, We may ask You to provide information to facilitate this transaction and to verify Your identity.

6. GDPR Privacy

Legal Basis for Processing Personal Data under GDPR.

We may process Personal Data under the following conditions:

- Consent: You have given Your consent for processing Personal Data for one or more specific purposes.
- Performance of a contract: Provision of Personal Data is necessary for the performance of an agreement with You and/or for any pre-contractual obligations thereof.
- Legal obligations: Processing Personal Data is necessary for compliance with a legal obligation to which the Company is subject.
- Vital interests: Processing Personal Data is necessary in order to protect Your vital interests or of another natural person.
- Public interests: Processing Personal Data is related to a task that is carried out in the public interest or in the

exercise of official authority vested in the Company.

- Legitimate interests: Processing Personal Data is necessary for the purposes of the legitimate interests pursued by the Company.

In any case, we will gladly help to clarify the specific legal basis that applies to the processing, and in particular whether the provision of Personal Data is a statutory or contractual requirement, or a requirement necessary to enter into a contract.

Your Rights under the GDPR

We undertake to respect the confidentiality of Your Personal Data and to guarantee You can exercise Your rights.

You have the right under this Privacy Policy, and by law if You are within the EU, to:

- Request access to Your Personal Data. The right to access, update or delete the information We have on You. Whenever made possible, you can access, update or request deletion of Your Personal Data directly within Your account settings section. If you are unable to perform these actions yourself, please contact Us to assist You. This also enables You to receive a copy of the Personal Data We hold about You.
- Request correction of the Personal Data that We hold about You. You have the right to to have any incomplete or inaccurate information We hold about You corrected.
- Object to processing of Your Personal Data. This right exists where We are relying on a legitimate interest as the legal basis for Our processing and there is something about Your particular

situation, which makes You want to object to our processing of Your Personal Data on this ground. You also have the right to object where We are processing Your Personal Data for direct marketing purposes.

- Request erasure of Your Personal Data. You have the right to ask Us to delete or remove Personal Data when there is no good reason for Us to continue processing it.
- Request the transfer of Your Personal Data. We will provide to You, or to a third-party You have chosen, Your Personal Data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information which You initially provided consent for Us to use or where We used the information to perform a contract with You.
- Withdraw Your consent. You have the right to withdraw Your consent on using your Personal Data. If You withdraw Your consent, We may not be able to provide You with access to certain specific functionalities of the Service.

Exercising of Your GDPR Data Protection Rights

You may exercise Your rights of access, rectification, cancellation and opposition by contacting Us at support@tricent.com. Please note that we may ask You to verify Your identity before responding to such requests. If You make a request, We will try our best to respond to You as soon as possible.

You have the right to complain to a Data Protection Authority about Our collection and use of Your Personal Data. For more

information, if You are in the European Economic Area (EEA), please contact Your local data protection authority in the EEA.

7. CCPA Privacy

Your Rights under the CCPA

Under this Privacy Policy, and by law if You are a resident of California, You have the following rights:

- **The right to notice.** You must be properly notified which categories of Personal Data are being collected and the purposes for which the Personal Data is being used.
- **The right to access / the right to request.** The CCPA permits You to request and obtain from the Company information regarding the disclosure of Your Personal Data that has been collected in the past 12 months by the Company or its subsidiaries to a third-party for the third party's direct marketing purposes.
- **The right to say no to the sale of Personal Data.** We will never sell you personal data.
- **The right to know about Your Personal Data.** You have the right to request and obtain from the Company information regarding the disclosure of the Following:
 - The categories of Personal Data collected
 - The sources from which the Personal Data was collected
 - The business or commercial purpose for collecting or selling the Personal Data
 - Categories of third parties with whom We share Personal Data
 - The specific pieces of Personal Data we collected about You

- **The right to delete Personal Data.**
You also have the right to request the deletion of Your Personal Data that have been collected in the past 12 Months.
- **The right not to be discriminated against.** You have the right not to be discriminated against for exercising any of Your Consumer's rights, including by:
 - Denying goods or services to You
 - Charging different prices or rates for goods or services, including the use of discounts or other benefits or imposing penalties
 - Providing a different level or quality of goods or services to You
 - Suggesting that You will receive a different price or rate for goods or services or a different level or quality of goods or services.