

# Privacy Policy

**Your privacy is critically important to us.**

*Edaptio ApS  
Birkedommervej 29, 2.sal  
2400 Copenhagen NV,  
Denmark*

It is Edaptio ApS's policy to respect your privacy regarding any information we may collect while operating our website. This Privacy Policy applies to <https://edaptio.com> and all subdomains of edpatio.com. (hereinafter, "us", "we", or "https://edaptio.com"). We respect your privacy and are committed to protecting personally identifiable information you may provide us through the Website. We have adopted this privacy policy ("Privacy Policy") to explain what information may be collected on our Website, how we use this information, and under what circumstances we may disclose the information to third parties. This Privacy Policy applies only to information we collect through the Website and does not apply to our collection of information from other sources.

This Privacy Policy, together with the Terms and conditions posted on our Website, set forth the general rules and policies governing your use of our Website. Depending on your activities when visiting our Website, you may be required to agree to additional terms and conditions.

## Website Visitors

Like most website operators, Edaptio ApS collects non-personally-identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Edaptio ApS's purpose in collecting non-personally identifying information is to better understand how Edaptio ApS's visitors use its website. From time to time, Edaptio ApS may release non-personally-identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

Edaptio ApS also collects potentially personally-identifying information like Internet Protocol (IP) addresses for logged in users and for users leaving comments on <https://edaptio.com> blog posts. Edaptio ApS only discloses logged in user and commenter IP addresses under the same circumstances that it uses and discloses personally-identifying information as described below.

## **Gathering of Personally-Identifying Information**

Certain visitors to Edaptio ApS's websites choose to interact with Edaptio ApS in ways that require Edaptio ApS to gather personally-identifying information. The amount and type of information that Edaptio ApS gathers depends on the nature of the interaction. For example, we ask visitors who sign up for a blog at <https://edaptio.com> to provide a username and email address.

## **Security**

The security of your Personal Information 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 Information, we cannot guarantee its absolute security.

## **Links To External Sites**

Our Service may contain links to external sites that are not operated by us. If you click on a third party link, you will be directed to that third party's site. We strongly advise you to review the Privacy Policy and terms and conditions of every site you visit.

We have no control over, and assume no responsibility for the content, privacy policies or practices of any third party sites, products or services.

## **[Https://edaptio.com](https://edaptio.com) uses Google AdWords for remarketing**

[Https://edaptio.com](https://edaptio.com) uses the remarketing services to advertise on third party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to you can opt out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

## **Protection of Certain Personally-Identifying Information**

Edaptio ApS discloses potentially personally-identifying and personally-identifying information only to those of its employees, contractors and affiliated organizations that (i) need to know that information in order to process it on Edaptio ApS's behalf or to provide services available at Edaptio ApS's website, and (ii) that have agreed not to disclose it to others. Some of those employees, contractors and affiliated organizations may be located outside of your home country; by using Edaptio ApS's website, you consent to the transfer of such information to them. Edaptio ApS will not rent or sell potentially personally-identifying and personally-identifying information to anyone. Other than to its employees, contractors and affiliated organizations, as described above, Edaptio ApS discloses potentially personally-identifying and personally-identifying information only in response to a subpoena, court order or other governmental request, or when Edaptio ApS believes in good faith that disclosure is reasonably necessary to protect the property or rights of Edaptio ApS, third parties or the public at large.

If you are a registered user of <https://edaptio.com> and have supplied your email address, Edaptio ApS may occasionally send you an email to tell you about new features, solicit your feedback, or just keep you up to date with what's going on with Edaptio ApS and our products. You can opt out of any and all email activities on the platform as per described by GDPR. We primarily use our blog to communicate this type of information, so we expect to keep this type of email to a minimum. If you send us a request (for example via a support email or via one of our feedback mechanisms), we reserve the right to publish it in order to help us clarify or respond to your request or to help us support other users. Edaptio ApS takes all measures reasonably necessary to protect against the unauthorized access, use, alteration or destruction of potentially personally-identifying and personally-identifying information.

## **Aggregated Statistics**

Edaptio ApS may collect statistics about the behavior of visitors to its website. Edaptio ApS may display this information publicly or provide it to others. However, Edaptio ApS does not disclose your personally-identifying information.

## **Affiliate Disclosure**

Edaptio uses affiliate links and does earn a commission from certain links. This does not affect your purchases or the price you may pay.

## **Cookies**

To enrich and perfect your online experience, Edaptio ApS uses "Cookies", similar technologies and services provided by others to display personalized content, appropriate advertising and store your preferences on your computer.

A cookie is a string of information that a website stores on a visitor's computer, and that the visitor's browser provides to the website each time the visitor returns. Edaptio ApS uses cookies to help Edaptio ApS identify and track visitors, their usage of <https://edaptio.com>, and their website access preferences. Edaptio ApS visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Edaptio ApS's websites, with the drawback that certain features of Edaptio ApS's websites may not function properly without the aid of cookies.

By continuing to navigate our website without changing your cookie settings, you hereby acknowledge and agree to Edaptio ApS's use of cookies.

## **E-commerce**

Those who engage in transactions with Edaptio ApS – by purchasing Edaptio ApS's services or products, are asked to provide additional information, including as necessary the personal and financial information required to process those transactions. In each case, Edaptio ApS collects such information only insofar as is necessary or appropriate to fulfill the purpose of the visitor's interaction with Edaptio ApS. Edaptio ApS does not disclose personally-identifying information. And visitors can always refuse to supply personally-identifying information, with the caveat that it may prevent them from engaging in certain website-related activities.

## **Business Transfers**

If Edaptio ApS, or substantially all of its assets, were acquired, or in the unlikely event that Edaptio ApS goes out of business or enters bankruptcy, user information would be one of the assets that is transferred or acquired by a third party. You acknowledge that such transfers may occur, and that any acquirer of Edaptio ApS may continue to use your personal information as set forth in this policy.

## **GDPR Privacy Notice**

General Data Protection Regulation (GDPR)

Article 13 of Regulation EU 2016/679

## 1. Purpose of this notice

This Privacy Notice provides mandatory information as required under Articles 13 and 14 of the European General Data Protection Regulation (GDPR) regarding the transparency of personal data processing. Definitions of certain terms within this notice are explained in the appendix.

## 2. The Data Controller for personal data

The Data Controller for the personal data processed by us is the Client Company of Edaptio (the employer of the natural person whose data is collected, hereafter referred to as the Data Subject). The Data Controller will pass personal data of their users to Edaptio to manage education on behalf of those users in connection with their business. Edaptio, as Data Processor acting on the instructions of the Data Controller under a written contract with them, will subsequently use that personal data to facilitate education for the Data Subject. It is this contract which forms the 'Legal Basis' for the processing of personal data carried out by Edaptio in these circumstances.

Edaptio will also become a Data Controller if it collects additional personal data directly from a Data Subject. In these circumstances Edaptio will be acting under a 'Legitimate Interest' to legally process the data for the management of education for the Data Subject and to fulfil the contractual requirements for its Client. Edaptio also acts as a Data Controller for any personal data held regarding its own employees, and legally processes this data under its Contract of Employment with those Data Subjects.

## 3. Your Rights

As a Data Subject you have rights under the GDPR. These rights can be seen below. Edaptio will always fully respect your rights regarding the processing of your personal data, and has provided below the details of the person to contact if you have any concerns or questions regarding how we process your data, or if you wish to exercise any rights you have under the GDPR.

## 4. Contact Details

The identity and contact details for the Data Protection Officer within Edaptio is:

Andreas Piculell, Chief Engineering Officer  
Edaptio ApS  
Birkedommervej 29, 2.sal  
2400 Copenhagen NV,  
Denmark

## 5. Data Protection Principles

Edaptio has adopted the following principles to govern its collection and processing of Personal Data:

Personal Data shall be processed lawfully, fairly, and in a transparent manner.

The Personal Data collected will only be those specifically required to fulfil education or other education-related requirements. Such data may be collected directly from the Data Subject or provided to Edaptio via his /her institution. Such data will only be processed for that purpose.

Personal Data shall only be retained for as long as it is required to fulfil contractual requirements, or to provide statistics to our Client Company.

Personal Data shall be adequate, relevant, and limited to what is necessary in relation to the purposes for which they are collected and/or processed. Personal Data shall be accurate and, where necessary, kept up to date.

The Data Subject has the right to request from Edaptio access to and rectification or erasure of their personal data, to object to or request restriction of processing concerning the data, or to the right to data portability. In each case such a request must be put in writing as in Section 3 above.

The Data Subject has the right to make a complaint directly to a supervisory authority within their own country. Edaptio's Data Protection compliance is supervised by:

Danish Data Protection Commissioner  
Datatilsynet  
Borgergade 28, 5.  
DK-1300 Copenhagen K  
Phone +45 33 19 32 00

Email: [dt@datatilsynet.dk](mailto:dt@datatilsynet.dk)

Personal Data shall only be processed based on the legal basis explained in section 2 above, except where such interests are overridden by the fundamental rights and freedoms of the Data Subject which will always take precedent. If the Data Subject has provided specific additional Consent to the processing, then such consent may be withdrawn at any time (but may then result in an inability to fulfil educational requirements).

## 6. Transfers to Third Parties

To fulfil the educational arrangements for a Data Subject it will in most cases be necessary to process personal data via a third party (these will include but are not limited to bug reporting, customer support, and credit card companies). Personal Data shall only be transferred to, or processed by, third party companies where such companies are necessary for the fulfilment of the educational arrangements.

Personal Data shall not be transferred to a country or territory outside the European Economic Area (EEA) unless the transfer is made to a country or territory recognised by the EU as having an adequate level of Data Security, or is made with the consent of the Data Subject, or is made to satisfy the Legitimate Interest of Edaptio in regard to its contractual arrangements with its clients.

All internal group transfers of Personal Data shall be subject to written agreements under the Company's Intra Group Data Transfer Agreement (IGDTA) for internal Data transfers which are based on Standard Contractual Clauses recognised by the European Data Protection Authority.

## Appendix – Definitions of certain terms referred to above:

### Personal Data:

(Article 4 of the GDPR): 'personal data' means any information relating to an identified or identifiable natural person ('data subject'); 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.

## Processing:

(Article 4 of the GDPR): means any operation or set of operations which is performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, erasure or destruction.

## Legal Basis for Processing:

(Article 6 of the GDPR): At least one of these must apply whenever personal data is processed:

1. Consent: the individual has given clear consent for the processing of their personal data for a specific purpose.
2. Contract: the processing is necessary for compliance with a contract.
3. Legal obligation: the processing is necessary to comply with the law (not including contractual obligations).
4. Vital interests: the processing is necessary to protect someone's life.
5. Public task: the processing is necessary to perform a task in the public interest, and the task or function has a clear basis in law.
6. Legitimate interests: the processing is necessary for the legitimate interests of the Data Controller unless there is a good reason to protect the individual's personal data which overrides those legitimate interests.

## Data Controller:

(Article 4 of the GDPR): this means the person or company that determines the purposes and the means of processing personal data.

## Data Processor:

(Article 4 of the GDPR): means a natural or legal person, public authority, agency or any other body which processes personal data on behalf of the controller.

## Data Subject Rights:

(Chapter 3 of the GDPR) each Data Subject has eight rights. These are:

1. The right to be informed; This means anyone processing your personal data must make clear what they are processing, why, and who else the data may be passed to.
2. The right of access; this is your right to see what data is held about you by a Data Controller.
3. The right to rectification; the right to have your data corrected or amended if what is held is incorrect in some way.
4. The right to erasure; under certain circumstances you can ask for your personal data to be deleted. This is also called 'the Right to be Forgotten'. This would apply if the personal data is no longer required for the purposes it was collected for, or your consent for the processing of that data has been withdrawn, or the personal data has been unlawfully processed.
5. The right to restrict processing; this gives the Data Subject the right to ask for a temporary halt to processing of personal data, such as in the case where a dispute or legal case has to be concluded, or the data is being corrected.
6. The right to data portability; a Data Subject has the right to ask for any data supplied directly to the Data Controller by him or her, to be provided in a structured, commonly used, and machine-readable format.
7. The right to object; the Data Subject has the right to object to further processing of their data which is inconsistent with the primary purpose for which it was collected, including profiling, automation, and direct marketing.
8. Rights in relation to automated decision making and profiling; Data Subjects have the right not to be subject to a decision based solely on automated processing.

## Privacy Policy Changes

Although most changes are likely to be minor, Edaptio ApS may change its Privacy Policy from time to time, and in Edaptio ApS's sole discretion. Edaptio ApS encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.