

Issued by: ME	Approved by: MS	Document no.: GSGP-A24-3
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Policy on privacy

Data controller:
Green Shift Group
Diplomvej 373
DK-2800 Lyngby
Denmark
Company registration number: DK 43828959

1. Introduction

1.1 This data protection and privacy policy (the "Policy") describes how Green Shift Group ("us," "we," or "our") collects and processes personal data relating to the purchase of services, membership, products, or general use of our website.

1.2 The Policy is prepared and made available to comply with the general data protection regulation (2016/679 of 27 April 2016) (the "GDPR") and the rules included herein on information to be provided to you.

2. Collecting personal data with cookies

2.1 cookies are collected and used based on consent by visiting and using our website(s). Information in these cookies includes browser type, search terms on our website(s) on other websites, IP address. We also collect the type of computer and technical information about means of connection to our websites, such as the operating system and the Internet service providers utilized and other similar information (hereinafter "Cookie data").

2.2 Cookie data is used to improve the website(s) and the user experience to deliver our products, services, or goods, administration of customer relationships in general (orders, purchase history, invoicing, etc.), customer support, and targeted marketing.

2.3 Use of cookies for the purpose of collecting personal data is in accordance with the Cookie Order (No. 1148 of 9 December 2011), section 3.

2.4 If you wish to limit or decline the cookies placed on your computer when visiting our website, you can do so at any time by changing your consent in the cookie box. You will find a shortcut to the cookie box in the left corner of the website. However, you should be aware that if you decline or reject cookies, it will impact on the functionality of the website, which means that there are features on the website that you will not be able to see. Any browser also allows you to delete cookies collectively or individually. How this is done depends on the browser used. Remember to delete the cookies from all browsers if you use several different browsers.

2.5 How long the cookies are stored on your computer varies. For more information about the expiration of the cookies, please refer to the "cookie declaration," which you will find in the cookie box.

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2.6 We disclose and/or share Cookie Data with trusted partners like Facebook, LinkedIn, YouTube, and analytics companies like Google Analytics may also place cookies on your device. Please read our partners' privacy policies to ensure that you're comfortable with how they use cookies.

2.7 We use Google Analytics as a web analytics service. This service provides statistical information about users of our website. Google Analytics processes IP addresses and information from cookies used on our website to clarify the number of page views, the number of users, and which browsers the users use. This information does not contain personally identifiable data. We use Facebook Pixel to track visitor activity on our website. This means that Facebook collects the following information:

- **Http Headers:** Anything present in HTTP headers. HTTP Headers are a standard web protocol sent between any browser request and any server on the internet. HTTP Headers include IP addresses, information about the web browser, page location, document, referrer, and the person using the website.
- **Pixel-specific Data:** Includes Pixel ID and Facebook Cookie.
- **Button Click Data:** Includes any buttons clicked by site visitors, the labels of those buttons, and any pages visited because of the button clicks.

Among others, we track the following events: view content, search tracking, lead tracking on form submission, and complete registration.

We use Facebook Pixel for the following purposes: Targeted marketing campaigns, including tracking conversions, remarketing/building custom audiences based on page visitors, and enhancing the targeting of ads. The cookies that are placed on your computer expire after 90 days.

You can read more about the Facebook Pixel via the following links: <https://www.facebook.com/business/learn/facebook-ads-pixel>.

You can choose not to receive targeted marketing by changing your ad preferences and settings on your Facebook account or by following the link

below: https://www.facebook.com/ads/preferences/?entry_product=ad_settings_screen.

For more information about the cookies that we place on your computer, including third-party cookies, please refer to the “cookie declaration” which you will find in the cookie box.

3. Types of personal data processed

3.1 We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data includes the following types of personal data: name, address, telephone number, email, invoicing and bookkeeping data and documentation, and payment card details. In addition, we also process the following types of personal data: IP Address, browser type, and version, time zone setting, browser plug-in types, versions, operating system, and platform, or other identifiable personal data only when it is voluntarily submitted.

Furthermore, we collect technical information about your visit, including Uniform Resource Locators (URL) clickstream, length of visits to certain pages, and page interaction information (such as scrolling, clicks, and mouseovers).

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When using myGSG, you may provide additional information to create a profile to be used to sell your services as a consultant to potential customers. The information provided may include CV, passport number, and social security number. We will only collect and process your social security number with your explicit consent.

3.2 We do not collect sensitive personal data (so-called "special categories of personal data"), and we only process such data if you send them to us on your own initiative.

3.3 As a general rule, we only collect personal data about you from you. If specific circumstances allow or require us to collect personal data about you from someone other than you, we will inform you hereof, which may be done by updating this, Policy.

3.4 If we need to collect more personal data than specified above, we will inform you about this. Such information may be provided by our updating of this Policy.

4. Purposes for processing personal data

4.1 We only process personal data for legitimate purposes in accordance with the GDPR. Depending on the circumstances, the personal data is processed for the following purposes:

- (a) To deliver products or services to a user, clients, or member.
- (b) To answer inquiries or complaints from users, clients, or members.
- (c) To give support and service messages, including answering questions and complaints and sending updates about our products and services.
- (d) To improve our products, services, or website.

4.2 We also process the personal data for the following purposes: for operation and maintenance purposes, including collecting files that record interaction with this Website and myGSG (System Logs or IP Address), for legal purposes, including in Court or in the stages leading to possible legal action arising from improper use of this Website, myGSG or related services and with respect to myGSG, in order to create a profile of the user and to share this with potential customers for the purpose of selling the users services as a consultant.

5. Legal basis for processing personal data

5.1 We only process your personal data when we have a legal basis for doing so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- a) If we have asked for consent for the processing of specific personal data, the legal basis for such personal data is consent, cf. article 6(1)(a) of the GDPR, as the consent can always be withdrawn by contacting us via the contact details provided at the end of this Policy, and, if the consent is withdrawn, the personal data processed based on consent is deleted, unless it can or must be processed, for example, to comply with legal obligations.

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- b) The processing is necessary for the purposes of legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, cf. the GDPR, article 6(1)(f).

6. Disclosure and transfer of personal data

6.1 We only pass on personal data to others when the law allows it or requires it. Our company is part of a concern/company group where personal data is shared between the group companies, depending on the circumstances.

6.2 We transfer personal data to the following recipients from the EU/EEA:

- (a) Banks (for example, in connection with payments etc.).
- (b) Data processors.
- (c) Suppliers.
- (d) Collaborators.

6.3 We may transfer personal data to affiliate or subsidiary companies, employees and service providers in charge of or involved in the operation of the Website or myGSG (administration, sales, marketing, legal, system administration), as well as agents and professional advisors. Furthermore, we may transfer personal data to external business partners, vendors, and suppliers to deliver a service to us or on our behalf, such as third-party technical service providers, mail carriers, hosting providers, IT companies, and communications agencies to assist in processing the personal data. The updated list of these parties may be requested at any time.

6.4 Occasionally, we use external companies as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless the applicable law allows for such transfer and processing. Where the external parties are data processors, the processing is always performed based on a data processor agreement by the requirements hereto under GDPR. Where the external parties are data controllers, the processing of personal data will be performed based on said external parties' data privacy policy and legal basis, which the external parties are obligated to inform unless the applicable legislation allows otherwise.

6.5 We transfer personal data to countries or international organizations outside the EU/ EEA.

6.6 If personal data is transferred outside the EEA, we ensure an adequate level of security by transferring to countries approved by the European Commission as having an adequate level of protection or by entering an appropriately drafted contract with the non-EEA entity receiving the data.

6.7 Our use of Facebook Pixel means that personal data may be transferred to Facebook Inc. in the USA. This transfer is based on Facebook Inc.'s self-certification under the "EU-U.S. Privacy Shield," which you can read more about here: <https://www.facebook.com/about/privacyshield>.

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For more information about Privacy Shield, see <http://www.privacyshield.gov/>.

7. Erasure and retention of personal data

7.1 We ensure that personal data is deleted when it is no longer relevant to processing purposes, as described above. We also retain personal data to the extent that it is an obligation from applicable law, as is the case with accounting and bookkeeping materials and records. If you have any questions about our retention of personal data, please contact the email mentioned at the bottom of this Policy.

8. Data subject rights

8.1 Data subjects have a number of rights that we can assist with. If a data subject wants to make use of his or her rights, he or she can contact us. The rights include the following:

8.1.1 The right of access: Data subjects have a right to ask for copies of the information we process about them, including relevant additional information.

8.1.2 The right to rectification: Data subjects have a right to ask for rectification of inaccurate personal data concerning him or her.

8.1.3 The right to erasure: In certain circumstances, data subjects have a right to obtain the erasure of personal data concerning him or her before the time when erasure would normally occur.

8.1.4 The right to restrict processing: Data subjects have, in certain situations, a right to have the processing of his or her personal data restricted. If a data subject has the right to have the processing of his or her personal data restricted, such personal data shall, except for storage, only be processed with the data subject's consent or for the establishment, exercise, or defense of legal claims or the protection of the rights of another natural or legal person or for reasons of important public interest in the European Union or of a European member state.

8.1.5 The right to object: In certain situations, data subjects have a right to object to the legal processing of his or her personal data. An objection can also be to the processing of personal data for the purpose of direct marketing.

8.1.6 The right to data portability: In certain situations, data subjects have a right to receive their personal data in a structured, commonly used, and machine-readable format and to transmit that data to another data controller without hindrance from the data controller to which the personal data has been provided.

8.2 More information about data subject rights can be found in the guidelines of the national data protection authorities.

If a data subject wishes to exercise his or her rights as described above, the data subject should use the contact details provided at the end of this Policy.

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We strive to do everything to meet wishes regarding our processing of personal data and the rights of data subjects. If you or others, despite our endeavors, wish to file a complaint, contacting the national data protection authorities can do this.

9. Changes to this Policy

9.1 We reserve the right to update and amend this, Policy. If we do, we will correct the date and the version at the bottom of this Policy. In case of significant changes, we will provide notification in the form of a visible notice, for example, on our website or by direct message.

10. Contact

10.1 If you have questions or comments about/to this Policy or if you would like to invoke one or more data subject rights, please contact us at me@greenshiftgroup.dk