

## COMPANY USER PRIVACY POLICY

(Version 1.0, June 2019)

By creating a business profile on or using any of the 'hoodHeroes websites, including but not limited to hoodheroes.co, hoodheroes.dk and hoodhero.es (the "Website") you **accept** these guidelines for processing personal data on the Website.

We, PennyWorthy IVS, Lyshøj Allé 27 4 tv, DK-2500 Valby, Denmark, ("hoodHeroes") recommend that you **print** and **keep** these guidelines.

### 1 Collecting information on the Website

#### 1.1 Company data

When you create a business profile on the Website, we collect the following master data: Your name, company address, domain, company name, country, password and your email address. The purpose of the collection of this information is to identify you as a customer when you log on to the Website. Furthermore, you can choose to add more information to your business profile, such as your details, website and company information. If you are a customer of 'hoodHeroes, we also collect information relevant to the fulfilment of the agreement between you and us.

#### 1.2 Reviews

When you write a reply to a review made by a user about your company, we collect the information you state in the reply, including company details and your name.

#### 1.3 Cookies

The Website uses cookies. Cookies are digital information which is stored on your computer. The cookie does not identify the individual user but the user's computer, and it is for example used for measuring Website traffic for the purpose of producing anonymous statistics in order to improve the functionality of the Website and to get the Website to work. You can read more about what cookies we use on the Website and for what purposes below.

#### 1.4 IP addresses

When visiting the Website, the IP address of your computer is registered. The IP address is the numerical address of the computer used when visiting the Website. The IP address is registered to enable 'hoodHeroes to trace the used computer in case of misuse or unlawful actions in connection with the visit on or use of the Website. Further, the IP address is used to derive your approximate location (city level).

#### 1.5 Newsletter

If you sign up for 'hoodHeroes's newsletters, 'hoodHeroes register the information supplied by you (e.g. your name, email address etc.). If you no longer wish to receive newsletters from 'hoodHeroes, you can unsubscribe by logging on to your profile and edit your information.

### 2 Disclosure of personal data

#### 2.1 Disclosure of data on the Website

Company data

The company information you insert when signing up or when updating your company profile page will be available for other users of the Website.

#### Other information

Other information provided by you on the Website, including your replies to users' reviews, are automatically made available for other users of the Website.

If you are a customer of 'hoodHeroes, we may also include information on our Website about whether you are or has been a customer of 'hoodHeroes.

#### 2.2 Disclosure to other services

A main purpose of 'hoodHeroes is to increase the exposure and the availability of the reviews made on the Website. Hence, we permit other services to show the reviews, including but not limited to companies' replies, created on the Website thus increasing other consumers' knowledge of 'hoodHeroes and the reviews.

The categories of third party services to which the information is disclosed are:

- Search engines, including e.g. Google and Bing,
- Consumer portals and business portals, including price comparison websites, shopping guides etc.
- Business portals
- Other similar websites where it in 'hoodHeroes's assessment will be relevant for the consumer to search for reviews.

If you write a reply to a review, your reply is disclosed when you make it available on the Website and disclosed in accordance with the above mentioned.

#### 2.3 Other disclosure

'hoodHeroes may be required to disclose information by a court order from a competent court of law or public authority in accordance with the existing legislation.

### **3 Data controller**

3.1 The information for which 'hoodHeroes is the data controller 'hoodHeroes shall be data controller of the data mentioned under section 1.

3.2 The information for which you are the data controller If you are a customer of 'hoodHeroes, you may be offered the possibility of using 'hoodHeroes's review invitation service to invite your customers (consumers). When enabling the review invitation service you are in accordance with applicable data protection legislation regarded as a data controller of the consumers' personal data, which is provided to 'hoodHeroes when you use the review invitation service. In such cases 'hoodHeroes is regarded as the data processor. You are also the data controller of the replies you write on 'hoodHeroes's website.

### **4 Data processor**

'hoodHeroes uses an external company for maintaining the technical operation of the Website and also sub-contractors for the performance of the review invitation service, including but not limited to APIs, e-mail distribution and hosting.

By accepting this privacy policy, you accept that 'hoodHeroes allows the data for which you are the data controller be processed by such data processors.

The data processors shall solely act according to instructions from 'hoodHeroes. By accepting these terms and conditions, you authorize 'hoodHeroes to give such instructions to the data processors which are necessary for the processing of data in accordance with this personal data policy and for the purpose of use of the Website and the review invitation service.

The data processors have in place necessary reasonable technical and organizational safety measures against the information being accidentally or illegally destroyed, lost or deteriorated, and against the information coming to the knowledge of unauthorized persons, is misused or in other ways is processed in violation with the act on processing of personal data. On your request, we will contact the sub-data processors and request them to supply you with sufficient information to demonstrate that the above-mentioned technical and organizational safety measures have been made.

## **5 Security measures**

'hoodHeroes will see to that the recorded data, including the personal information, is handled carefully and protected properly following the currently applicable safety standards. 'hoodHeroes regularly audits its system for possible vulnerabilities and attacks. However, since the internet is not a 100% secure environment, 'hoodHeroes cannot ensure or warrant the security of information you transmit to 'hoodHeroes. Emails sent via the Website are not encrypted, and 'hoodHeroes therefore advises you not to communicate any confidential information through these means.

## **6 Cookies**

This website uses cookies and in the following we describe what cookies we use and for what purposes.

By using our website you accept that we use cookies as described in the following.

### **6.1 What is a cookie?**

Cookies are small information units which the Website places on your Internet connected browser device. Cookies contain information that the Website uses to make the communication between you and your web browser more efficient. The cookie does not identify you as an individual user but identifies your computer.

There are two types of cookies - session cookies and persistent cookies. Session cookies are temporary bits of information which are deleted when you exit your web browser. Persistent cookies are more permanent bits of information that are stored and remain on your computer until they are deleted. Persistent cookies delete themselves after a certain period of time but are renewed each time you visit the Website.

The Website uses session cookies and persistent cookies.

### **6.2 What type of cookies do we use and for what purposes?**

We use cookies before and after you sign in on our business site:

- Statistics:

Measuring Website traffic i.e. number of visits on the Website, which domains the visitors come from, which pages the visitors visit and the actions taken on the Website and in which overall geographical area the visitors are located.

- Improvement of the functionalities of the Website:

Optimizing your experience with the Website, including but not limited to performing split tests and remembering your user ID and password when you return to the Website so you do not have to log in again.

- Direct communication and advertisement:

Displaying relevant advertisements on third party sites and for automated marketing purposes.

- Making the Website work:

Remembering your user ID and password while you are logged in so you do not have to log in again each time you click on different pages on the Website.

### 6.3 Third party cookies

Our Website use cookies from the following third parties:

Google Analytics: for statistical purposes. You can decline cookies from Google Analytics by clicking on this link: <http://tools.google.com/dlpage/gaoptout>

Mixpanel: for statistical purposes. You can decline cookies from Mixpanel by clicking on this link: <https://mixpanel.com/optout/>

Visual Website Optimizer: for optimizing purposes, including split tests. You can decline cookies from Visual Website Optimizer by clicking on this link: <http://visualwebsiteoptimizer.com/opt-out.php>

Eloqua: for the purpose of automated marketing and to recognize a return visitor as a unique user and linking the information stored in the cookie to personally identifiable information provided while on the Website. You can decline cookies from Eloqua by clicking on this link: <http://www.eloqua.com/trust/privacy-policy/opt-status.html>

Google Remarketing: for the purpose of displaying relevant advertisements on third party sites.

### 6.4 Deletion of cookies

If you want to delete the cookies already on your equipment, you can, if you use a PC or a more recent browser, press CTRL + SHIFT + DELETE simultaneously. If the shortcuts do not work on your browser, please visit the support page for the browser in question.

Please note that our Website may not work in its full extend if you delete the cookies.

## **7 Access, correction and deletion**

### 7.1 Access

Upon request to 'hoodHeroes via the contact information stated in section 9, 'hoodHeroes shall inform you of the purpose of the processing; who receives the information and from where the information originates.

Requests regarding the above shall only be processed if more than 6 months have lapsed since your previous request, unless you can substantiate a special interest in obtaining the information earlier.

## 7.2 Correction and deletion

If you discover that the information which 'hoodHeroes as the data controller process about you is incorrect or misleading, 'hoodHeroes shall make the correction hereof on your request.

You may at any time correct or delete any content and information on the Website for which you are the data controller, cf. section 0.

'hoodHeroes reserves the right to block the access to your business profile and/or delete your profile in accordance with the agreement between you and us. If we block your business profile, you will be informed as well as on the reason for blocking by email to the address you have stated when signing up.

## 8 Changes in the privacy policy

We may at any time and without notice make changes to our privacy policy with future effect. We will inform you of such changes when you log on to the Website. You agree that the continued use of the Website after any posted modified version of the Privacy Policy is your acceptance of the modified Privacy Policy.

## 9 Inquiries regarding the Website or the privacy policy

In case of inquiries regarding 'hoodHeroes's privacy policy, our processing of personal data, correction of data or your relations to us in general, you are welcome to contact 'hoodHeroes on the following address:

PennyWorthy IVS, Lyshøj Allé 27 4 tv, DK-2500 Valby, Denmark, CVR no.: 39745267, telephone: +45 7179 4220, Email: hello@hoodheroes.co.