

DOVISTA Privacy Policy



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Introduction

In a world of continuous growth of business potential, technological opportunities, and at the same time in a complex of risks and threats emerging everywhere, it becomes important to define and align basic principles of how to balance risks and opportunities through common platform and standards to secure and operate a stable platforms and good compliance.

The following policy will together with other national or regional regulation form the requirements for how business managers are required to operate in the business group of DOVISTA. Furthermore, below you will find a formal chapter, that would be needed for each legal entity across DOVISTA.

This policy is deployed in English and will be maintained in English only through ongoing review and will be updated at least annually and communicated to all units within the scope of its content.

Target Group

The policy applies to the entire company including all units, subsidiaries and independent brands owned in full or partially by DOVISTA A/S.

See www.dovista.com for list of legal companies.

Scope

All business units in DOVISTA must comply with this Privacy policy as well as making it publicly available through company websites and other medias. It is the responsibility of the local management in each DOVISTA entity to ensure compliance and transparency regarding privacy and information processing.

Subsequently to present policy, specific other policies apply within the scope of Information Security for any business unit within the group of DOVISTA.

Purpose & Policy

Privacy statement

We respect and protect your privacy. In the following, you can read about how we handle your privacy information within our company per legal entity.

This Privacy Policy ('Privacy Policy' and 'we') describes the type of personal information ('personal data') we process. This Privacy Policy also sets out how and why, the legal bases on which your personal data is processed and your rights with respect to your personal data.

This DOVISTA Group Privacy Policy complies with the EU General Data Protection Regulation 2016/679 ('GDPR') and DOVISTA Legal Entity Name. The data controller is [entity name]. Hereinafter 'entity name'.

Our parent company is DOVISTA A/S, registered in Denmark under registration number 21 14 75 83 with its registered office at:

Bygholm Søpark 21D
DK-8700 Horsens, Denmark.

This Privacy Policy covers the following areas:

- 1. Lawful basis for our data processing*
- 2. What data do we collect, and why*
- 3. How we collect your personal data*
- 4. Sharing your data with others*
- 5. Your privacy rights*
- 6. Data security, integrity, and retention*

1. Lawful basis for our data processing

The main reason we process your data is to allow us to provide our services to you. "Service", "our service" and similar descriptions mean conducting business with you/your organisation and assisting you with inquiries, sales processes, and claims. We also process information about your use of the services for business development purposes, informing you of our business operations, products, and services through marketing, and improving our services through any feedback, you give us. We may also process your personal data for contractual and recruitment purposes and to comply with legal obligations. Please see the Section "What data we collect and why" for further information about why we process your personal data.

We process personal data based on different legal bases as listed and exemplified below.

Performance of a contract, including a purchase – *GDPR article 6(1)(b)*:

- When we process personal data in relation to a contract, our legal basis is 'performance a contract', including a purchase.

Consent – *GDPR article 6(1)(a)*:

- When we send out a newsletter about our products, we do this based on your consent. When the lawful basis for processing is consent, you have the right to withdraw your consent at any time.

Legal obligation – *GDPR Article 6(1)(C)*:

- If we share your personal data with law enforcement agencies or other governmental bodies, we share this because we have a legal obligation to do so.

Legitimate interest - *GDPR Article 6(1)(f)*:

- When we have a legitimate business interest in processing your data, among others, when we assist you with enquires.

Special categories – *and article 9(2)(a) and GDPR article 9(2)(f)*:

- When we process special categories of data, we do so to comply with regulatory requirements related to compliance matters.

2. What data do we collect, and why

The following are the main categories of data collected by “ENTITY NAME”, the main purpose and legal basis for collecting the personal data:

Object	Data specification (for illustration purposes)	Purpose(s)	Legal basis	Storage time
General business operations	Name, contact details and other information necessary for conducting business with you or your organisation.	As part of general “ENTITY NAME” business operations, we collect personal data about individuals, customers, suppliers (including third party service providers) and other stakeholders. We may also use your data for testing systems.	GDPR Article 6(1) (b) GDPR Article 6(1) (f)	We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the information and the reason that we have the information.
Assisting with enquiries	Name, email address, phone numbers, conversations, other contact details, photos, floor plans of your house when you provide this to “ENTITY NAME”.	You may choose to provide us with personal data, such as contact details when you contact us by phone, email, post, our chatbot or by using our digital platforms available. This personal data enables us to respond to requests for information on such matters as “ENTITY NAME” products, to arrange a measure and quote for installation of “ENTITY NAME” products, or to arrange for a window to be serviced, or to present claims under the “ENTITY NAME” guarantee. The information may be disclosed to “ENTITY NAME” A/S or other “ENTITY NAME” sales companies within the Group, relevant independent installers or dealers in order for us to assist customers with their enquiry or arrange for services or a quote. Some companies record calls for training purposes. We may also ask you to provide your feedback through surveys after the interaction.	GDPR Article 6(1)a GDPR Article 6(1) (b) GDPR Article 6(1) (f)	We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the information and the reason that we have the information. For example, call recordings will be stored for a period of 90 days.
Sales (including web sales) and order fulfilment.	Name, contact details, payment and credit card details, credit information, and credit check etc.	We may collect personal data of customers and prospective customers in order to conduct business with you or your organisation. We use your data to analyse shopping trends through your webshop activity and purchase history to provide	GDPR Article 6(1) (b) GDPR Article 6(1) (a) GDPR Article 6(1) (f)	We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the information and the reason that we have the information.

		<p>you a personalized browsing experience. Furthermore, we use the data for processing and fulfilling web shop orders by facilitating the delivery of product orders and providing relevant customer service, including processing your returns. We may disclose the information to dealers or independent installers and logistic partners to process a customer's order, including arranging delivery of "ENTITY NAME" products to the customer or assisting with enquiries such as arranging consultation between you and our product advisors. We also share your information with third parties for credit check purposes.</p>		<p>Storage time is mainly based on financial, consumer and compliance law.</p>
Campaigns	Name, contact details, etc.	<p>Execution of various campaigns (e.g., reward programs, cashback campaigns, sweepstakes). Acceptance of terms and conditions is collected before entry to the activity.</p>	<p>GDPR Article 6(1)a GDPR Article 6(1)b</p>	<p>Until you opt-out from the campaign.</p>
Product claims	Name, contact details, etc.	<p>Facilitate service of "ENTITY NAME" products under the "ENTITY NAME" guarantee or by paid service. We solve claims by call, email, visits on building sites. We share your personal data with "ENTITY NAME" partners to assist you with a service. We may ask you to provide your feedback through surveys after the interaction.</p>	<p>GDPR Article 6(1) (c) GDPR Article 6(1) (f)</p>	<p>We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the information and the reason that we have the information.</p>
Business development and "ENTITY NAME" apps	Personal data, which is collected at our digital platforms and in "ENTITY NAME" apps.	<p>The personal data you provide to us, and personal data collected at our digital platforms will be used to enhance our consumer insights and drive relevant communication and offers across all touch points you may have with "ENTITY NAME". Personal data will also be used for product and service development.</p>	<p>GDPR Article 6(1) (a)</p>	<p>We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy and for the app to function properly and until consent is withdrawn. This means that the retention periods will vary according to the type of the information and the reason that we have the information.</p>
Marketing	Contact information, browsing history, sales and subscription service information, such as name, address, email, phone number, purchase history, unique identifiers such as cookie ID's or device ID's, tracked browsing history based on these ID's, etc. Please be aware that this list is not exhaustive	<p>Based on your consent or legitimate interest, when applicable, we process your personal data for the purpose of informing you of "ENTITY NAME" business operations, products, and services. For the above purposes, we create marketing, tailored to your preferences and profile, e.g.: - To optimize and tailor the content and delivery of our marketing</p>	<p>GDPR Article 6(1) (a) GDPR Article 6(1) (f)</p>	<p>We will only retain your personal information for as long as is necessary. Please note that when processing based on consent you can withdraw your consent at any time.</p>

	<p>as we may process any personal information collected in connection with your interactions with "ENTITY NAME" A/S, our websites, mobile applications, products, and services.</p>	<p>communications when you want to receive them, and - To give you tailored marketing based on your preferences and profile, both when engaging with us on our own channels as well as via third party channels (e.g., social media, search sites, marketplaces). If you do not wish to receive any further information, you can easily and free of charge unsubscribe from our marketing communication anytime. You will find ways to unsubscribe in connection with subscribing to or receiving marketing communication from us. You can also contact us by email or post to unsubscribe, see Section 8. For some marketing activities we act as joint controller with other "ENTITY NAME" companies and have entered into joint controller agreements dividing the roles and responsibilities between the "ENTITY NAME" companies.</p>		
<p>Your participation in photos, video, testimonial and campaigns</p>	<p>If you have agreed to it and sent a photo to us or if your photo is taken by a photographer hired by us.</p>	<p>We will use the photo, testimonials etc. as described in the contract signed by you.</p>	<p>GDPR Article 6(1) (b) when the photo and testimonial is based on a contract with compensation, please note that you cannot exercise the right to have the photo corrected, erased/deleted, GDPR Article 6(1) (a) If the photo and testimonial is processed based on consent where you can exercise all rights specified under section 6 below.</p>	<p>We will store the photo and testimonials for as long is necessary and as described in the contract.</p>
<p>Website visitors, customer surveys and market research</p>	<p>Personal data from digital platforms or customers as part of surveys.</p>	<p>To improve the products and services we offer our products and services, we may collect personal data from digital platform visitors or customers as part of surveys. We will contact you with a survey and process personal data as part of surveys through either consent or legitimate interests. Surveys processing personal data for marketing purposes will be used only with your consent.</p>	<p>GDPR Article 6(1) (a) GDPR Article 6(1) (f)</p>	<p>We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the information and the reason that we have the information.</p>
<p>Recruitment and employment contracts</p>	<p>Name, contact details, working history, educational diplomas, relevant record checks, information about professional interests, etc.</p>	<p>When a person applies for a job or enters into an employment contract with us, we may collect certain information such as name, contact details, information about working history, educational diplomas, relevant record checks and information about professional interests. This may be collected from the person directly, from a recruitment consultant and from the person including references and publicly available</p>	<p>GDPR Article 6(1) (b) GDPR Article 6(1) (f)</p>	<p>We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy and other recruitment policies. Personal data are kept until the end of the recruitment process or withdrawal of the consent (if given for future recruitments).</p>

		sources. This information is used to inform or assist us in the decision as to make the person an offer of employment or engage the person under a contract. For further information please read our Recruitment Process Privacy Notice.		
Compliance including anti-corruption, Whistle Blower hotline and sanctions check	All types of personal information.	We may collect personal data to comply with the law, a court or authority's decision and/or to disclose information to relevant public authorities as required or permitted by the law.	GDPR Article 6(1) (c) GDPR Article 6(1) (f) GDPR Article 9(2) (a) GDPR Article 9(2) (f)	We will only retain your personal information for as long as is necessary for the purposes described in this Privacy Policy. This means that the retention periods will vary according to the type of the information and the reason that we have the information. Accordingly, to laws which we are obliged to comply with.

3. How we collect your personal data

3.1. Directly from you

In most cases, personal data is collected directly from you or generated as part of the use of our services, products, and channels. We collect personal data, you provide to us, when you request products, services, or information from us, register with us, participate in public forums, use a chatbot or other activities on our digital platforms and apps, respond to customer surveys, or otherwise interact with us. We collect information through various technologies, e.g., cookies. For cookies, we refer to our Cookie Policy.

3.2. From our business partners

In some cases, we can collect your personal data from our business partners, when they need our assistance to provide you with the best possible service.

3.3. From your public website

In some cases, we collect your personal data on your company websites, when we want to offer you our services.

3.4. Links to other websites

This website contains links to other websites (such as Facebook, Google+, YouTube, and Pinterest) to which this Privacy Policy does not apply. Please note that we do not endorse other websites and their content. We encourage you to read the privacy policies of each website you visit.

4. Sharing your data with others

Our company is a part of the DOVISTA Group which operates globally. We share your personal information within the DOVISTA Group, but only if it is necessary in order to fulfil the purpose of which we are processing your personal data.

All entities in the DOVISTA Group have entered into an Intercompany Data Processing Agreement and/or joined agreement where everyone follows the same procedures when processing personal data, ensuring the same level of security is maintained throughout the Group, dividing the roles and responsibilities between the DOVISTA Group companies.

If two or more companies acts as joint controllers, each of the joint controllers is obliged too independently:

- Be the first contact for you
- Fulfil the information obligations referred to in Articles 13 and 14 of the GDPR
- Exercise your rights provided in Articles 15-22 of the GDPR (section 5 of this Privacy Policy)
- Deal with privacy breach notifications and privacy complaints.

We may also share your personal data with selected third parties, including but not limited to:

- Business partners, suppliers, and sub-contractors that we cooperate with to deliver you the best services during the support and sales process, for example, logistic providers, outsourced customer services.
- Technology providers, for example, analytics, tracking technologies, targeting and re-targeting technologies, and search engine providers that assist us in the improvement and optimisation of our platforms, companies who provide us with website support and hosting.
- Advertisers and advertising networks that use data to select and serve relevant adverts to you and others if you have given your consent.
- Social networking sites such as Facebook, Instagram, and Google, if required, when processing for marketing purposes and based on your consent.
- With other parties to ensure the safety and security of our customers, to protect our rights and property to comply with legal processes, or in other cases if we believe in good faith that disclosure is required by law.
- DOVISTA Group companies or third parties who operate digital platforms and tools on behalf of our company to provide services connected with our activities (e.g., points collection program, cashback campaign, sweepstakes, and training).

When we cooperate with external service providers, we enter into a data processing agreement, if relevant. These service providers are prohibited from using your personal data for purposes other than those requested by us or required by law.

4.1 Transfer to third countries

We transfer data either only to countries that can provide an adequate level of data protection to the EU or to recipients with whom we have concluded standard contract clauses ("SCC") approved by the European Commission as well as any supplementary measures the supplier has available. Upon request, we will provide you with a copy of the SCCs used.

5. Handling data breaches

Data breaches shall be reported to privacy@dovista.com. The handling of data breaches in the DOVISTA group is handled in cooperation between the Group Privacy Lead and the local responsible in the respective DOVISTA entity.

6. Your privacy rights

The GDPR provides you, as the data subject, with the following rights in respect of the personal data we store about you:

Your rights	Legal basis	Elaboration
Information about collection and access to your data	GDPR article 13 & 15	You have the right to request information about whether "ENTITY NAME" processes personal data relating to you, and if so, you have the right to request a copy of the personal data we have processed.
Request rectification	GDPR article 16	At any time, you have the right to request correction of any incorrect or incomplete personal data we may process on you.
Request erasure	GDPR article 17	You have the right to request deletion of your personal data by "ENTITY NAME" depending on the processing activity, and under certain circumstances, before we would normally be obligated to cease processing and delete your personal data by law or in accordance with our deletion procedures as set out above.
Request restriction of processing	GDPR article 18	You have the right to request the restriction of processing which means that you can request that "ENTITY NAME" restricts the use of your personal data in certain circumstances.
Data portability	GDPR article 20	Under certain conditions, you have the right to receive the personal data you provided to us in a machine-readable format.
Right to object	GDPR article 21	If you are not satisfied with how we process personal data in "ENTITY NAME", you can object to this by sending it to your local HR Business Partner who will distribute this. If a complaint is made, the name and contact details of the complainant must be provided to "ENTITY NAME". If you consider that we have failed to resolve the complaint satisfactorily, you may file a complaint to your local Data Protection Agency. You can find the contact details of your national Data Protection Agency on the European Data Protection Board website: www.edpb.europa.eu .

If you have any questions regarding the specific personal data about you that we process or retain or if you want to exercise your rights, please contact privacy@dovista.com.

We will respond to your request to exercise any of your rights within one month, but we have the right to extend this period by two months. If we extend the response period, we will inform you within one month of your request.

If you consider that we have failed to resolve the complaint satisfactorily, you may file a complaint to your local Data Protection Agency. You can find the contact details of your national Data Protection Agency on the European Data Protection Board website: www.edpb.europa.eu.

7. Data security, integrity, and retention

The security, integrity, and confidentiality of your personal data is important to us. We have implemented technical, administrative, and physical security measures that are designed to protect your personal data from unauthorized access, disclosure, use, and modification. From time to time, we review our security procedures to consider appropriate recent technology and methods. Please be aware that despite our best efforts, no security measures are perfect or impenetrable.

8. Changes to this “ENTITY NAME” Privacy Policy

From time to time, we may change this Privacy Policy to accommodate the latest technologies, industry practices, regulatory requirements, or for other purposes. At all times, we will post the most recent version on our digital platforms. We advise you to read the Privacy Policy regularly.

Cookie Policy

For any website used as media for exposing our company, sales material, marketing or in any other purpose of company websites, we might accordingly use cookies for tracking and saving behavior on our sites accordingly. The following information will outline how we are working with cookies and what kind of information should be made available on our websites.

Description of cookie policy for websites:

This cookie policy covers <<WEBSITE URL>> (i.e., DOVISTA.com) and all parallel or related websites within company group, which together gives a visitor the possibility to browse our website and use our services. In the following these will collectively be referred to as the “website”.

A cookie is a small file of letters and numbers downloaded on to a device (e.g., computer hard disk, telephone) when a user is accessing certain websites. Cookies allow a website to recognize the user’s device and help the website remember information regarding your preferences (e.g., the language you selected) so you do not need to repeat selection of your preferences each time you enter the site from the particular device. Most major websites use cookies.

How this site uses cookies and the information we collect

Three types of cookies are used on this website:

- **Session Cookies:** These are temporary cookies, which only exist in the period you access the website (or more strictly, until you close the browser after accessing the website). Session cookies help the DOVISTA website remember what you chose on the previous page, thus avoiding having to re-enter information. On our website, these cookies do not contain personal information, and cannot be used to identify you.
- **Persistent Cookies:** These are cookies, which remain on your device after you have visited our website. These cookies help us identify you as a unique visitor (by storing a randomly generated number) and help us remember the products you selected in your shopping cart when returning to our website and in case of multi-language sites, the language you selected. The length of time a cookie will remain on your device will depend on the type of cookie. On our website, these cookies do not contain personal information, and cannot be used to identify you.
- **Tracking cookies:** These cookies are used to provide meaningful site traffic reports about the usage of the website. We use the following business partners to manage this tracking:
 - [Google Analytics - read more](#)

How to restrict or to remove cookies from your device

We do not use cookies to collect personally identifiable information about you. However, if you wish to restrict or block the cookies which are set by this website, or delete cookies already created, you can do this through your browser settings. Your browser's HELP function should tell you how to do this, or your mobile phone manual.

Alternatively, you may wish to visit aboutcookies.org (in English), which contains comprehensive guidelines about how to do this on a number of different browsers.

If you wish to see the content of a cookie, please just click on the cookie to open it. You will see a short string of text and numbers. If you need further information, please use the contact us form.

Online access to DOVISTA's Cookie policy via this link:

<https://dovista.dk/cookie-politik/>

Comments and Questions

If you have a comment or question about this DOVISTA Cookie Policy, please contact privacy@dovista.com

You may file a complaint about the way we process your personal data. You can contact us by using the contact details stated at the end of this statement. If a complaint is made, the name and contact details of the complainant must be provided to DOVISTA. We will investigate the complaint and respond within one month. If you consider that we have failed to resolve the complaint satisfactorily, you may file a complaint to:

Datatilsynet

Carl Jacobsen Vej 35
2500 Valby, Denmark
Phone: +45 33 19 32 00
dt@datatilsynet.dk

Responsible

- VP, General Council is responsible and accountable for ensuring the compliance with the policy in the individual companies/functions
- CIO is responsible for the Cookie policy within
- FR&C Risk & Compliance, IT Compliance Manager and GDPR Data Lead are responsible for controlling and monitoring the compliance with the policy and the efficiency of the controls.