

# Privacy Policy

Modified 22 October, 2018

## Our privacy obligations

Matriks IT takes privacy seriously and cares about personal information.

'Personal information' means information or an opinion about an identified individual, or an individual who is reasonably identifiable. Matriks IT 's Privacy Policy applies to personal information collected and/or held by Matriks IT.

This Privacy Policy also explains how we process 'personal data' about people in the European Union (EU), as required under the General Data Protection Regulation (GDPR).

We will review this policy regularly, and we may update it from time to time.

## The types of personal information we collect and hold

We collect personal information about our users in order provide our products, services, and customer support. Our products, services, and customer support are provided through many platforms including but not limited to: websites, phone apps, email, and telephone. The specific platform and product, service, or support you interact with may affect the personal data we collect.

Not all information requested, collected, and processed by us is "Personal Information" as it does not identify you as a specific natural person. This will include majority of "User Generated Content" that you provide us with the intention of sharing with other users inside a transaction. Such "Non-Personal Information" is not covered by this privacy policy. However, as non-personal information may be used in aggregate or be linked with existing personal information; when in this form it will be treated as personal information. As such, this privacy policy will list both types of information for the sake of transparency.

In some situation users may provide us with personal information without us asking for it, or through means not intended for the collection of particular types of information. Whilst we may take reasonable steps to protect this data, the user will have bypassed our systems, processes, and control and thus the information provided will not be governed by this privacy policy.

In some situations, users may provide us personal information over platforms that are outside our control; for example, through social media or forums. Whilst any information collected by us is governed by this Privacy Policy, the platform by which it was communicated will be governed by its own Privacy Policy.

## How we collect personal information

## **Information that you specifically give us**

While you use our products and services you may be asked to provide certain types of personal information. This might happen through our website, applications, online chat systems, telephone, paper forms, or in-person meetings. We will give you a Collection Notice at the time, to explain how we will use the personal information we are asking for. The notice may be written or verbal.

We may request, collect, or process the following information:

- Account Details - password
- Contact Details - email address, phone number
- Location Details - physical address, billing address, time zone
- Identity Details - full name
- Financial Information - credit card details, wire transfer details, payment processor details (e.g. PayPal), tax numbers
- User Generated Content - transaction descriptions, transaction attachments

## **Information that we collect from others**

Users have the ability to start a transaction with non-users by providing contact details such as email address, physical address, and phone number. In these situations, the information will be collected and stored by us to contact the non-user and to prevent abuse of our systems.

Your payment provider may transmit information about the payment that we may collect or process.

In some situations, personal information of users may be collected from public sources.

We may collect or process the following information:

- Contact Details - email address, phone number
- Location Details - Physical Address, billing address, time zone
- Financial Information - transaction details, payment account details (e.g. PayPal email address and physical address), wire transfer details
- User Generated Content - transaction description

Our partners may create transactions on your behalf, in these situations the information that can be provided is the same as the information we may request, collect and process from individual users. Whilst our partners platforms will be governed by their own privacy policy, any personal information that is transferred to our platform will be treated and protected as though it was submitted by a user.

## **Information we collect as you use our service**

We maintain records of the interactions we have with our users, including the products, services and customer support we have provided. This includes the interactions our users have with our platform such as when a user has viewed a page or clicked a button.

When we are contacted we may collect personal information that is intrinsic to the communication. For example, if we are contacted via email, we will collect the email address used.

We may collect or process the following (mostly non PII) information:

- Metadata - IP address, computer and connection information, referring web page, standard web log information, language settings, time zone, etc.
- Device Information - device identifier, device type, device plugins, hardware capabilities, etc.
- Actions - pages viewed, buttons clicked, time spent viewing, search keywords, etc.

## **Links to other sites**

On our website, you will encounter links to third party websites. These links may be from us, or they may appear as content generated by other users. These linked sites are not under our control and thus we are not responsible for their actions. Before providing your personal information via any other website, we advise you to examine the terms and conditions of using that website and its privacy policy.

## **How we use personal information**

The information we request, collect, and process is primarily used to provide users with the product or service they have requested. More specifically, we may use your personal information for the following purposes:

- to provide the service or product you have requested;
- to facilitate the creation of Matriks IT Agreements;
- to provide technical or other support to you;
- to answer enquiries about our services, or to respond to a complaint;
- to promote our other programs, products or services which may be of interest to you (unless you have opted out from such communications);
- to allow for debugging, testing and otherwise operate our platforms;
- to conduct data analysis, research and otherwise build and improve our platforms;
- to comply with legal and regulatory obligations;
- if otherwise permitted or required by law; or
- for other purposes with your consent, unless you withdraw your consent for these purposes.

The 'lawful processing' grounds on which we will use personal information about our users are (but are not limited to):

- when a user has given consent;
- when necessary for the performance of a contract to which the user is party;
- processing is necessary for compliance with our legal obligations;
- processing is necessary in order to protect the vital interests of our users or of another natural person;

- processing is done in pursuing our legitimate interests, where these interests do not infringe on the rights of our users.

## **When we disclose personal information**

### **To other parties in your transactions**

We may disclose your personal information to third parties that participate in a transaction with you, including but not limited to:

- counterparties,
- brokers; and,
- affiliates involved in origination of the transaction.

### **Our third-party service providers**

The personal information of users may be held or processed on our behalf outside Denmark, including 'in the cloud', by our third-party service providers. Our third-party service providers are bound by contract to only use your personal information on our behalf, under our instructions.

Our third-party service providers include:

- Cloud hosting, storage, networking and related providers
- SMS providers
- Payment and Banking providers
- Marketing and analytics providers
- Security providers
- Chat providers
- Email providers

### **Other disclosures and transfers**

We may also disclose your personal information to third parties for the following purposes:

- if necessary to provide the service or product you have requested;
- We receive court orders, subpoenas or other requests for information by law enforcement,
- if otherwise permitted or required by law; or
- for other purposes with your consent.

## **Accessing or correcting your personal information**

You have the right to request access to the personal information Matriks holds about you. Unless an exception applies, we must allow you to see the personal information we hold about you, within a reasonable time period, and without unreasonable expense for no charge. Most personal information can be accessed by logging into your account. If you

wish to access information that is not accessible through the platform or wish to download all personal information we hold on you in a portable data format, please contact our Privacy Officer.

You also have the right to request the correction of the personal information we hold about you. All your personal information can be updated through the user settings pages. If you require assistance please contact our customer support.

## **Exercising your other rights**

You have a number of other rights in relation to the personal data Matriks holds about you, however, there may be restrictions on how you may exercise the rights. This is largely due to the nature of the products and services we provide. Much of the data we collect is in order to facilitate contracts between users, facilitate payments, provide protection for the legitimate users, and meet our legal obligations - these data uses are protected against the below rights.

You have the right to:

- opt-out of direct marketing, and profiling for marketing
- erasure
- temporary restriction of processing.

Direct marketing and profiling - users can unsubscribe by sending us an email included at the bottom of the Privacy Policy.

Erasure - Most personal information cannot be deleted as they are used to support contracts between users, document financial transactions, and are used in providing protection for users on the platform. In the case of non-personal data that can be linked with personal data, it will either be erased or otherwise anonymized from the personal data.

Temporary restriction to processing - under certain circumstances you may exercise this right, in particular if you believe that the personal data we have is not accurate, or you believe that we do not have legitimate grounds for processing your information. In either case you may exercise this right by contacting our privacy officer.

Unless stated above, users may exercise any of the above rights by contacting our Privacy Officer.

## **To contact our Privacy Officer**

If you have an enquiry or a complaint about the way we handle your personal information, or to seek to exercise your privacy rights in relation to the personal information we hold about you, you may contact our Privacy Officer as follows:

By Email:

[PrivacyOfficer@matriks.com](mailto:PrivacyOfficer@matriks.com)

By Mail:

Attn: Privacy Officer

Matriks IT ApS

Nymøllevej 50

DK-2800, Lyngby

Denmark

While we endeavor to resolve complaints quickly and informally, if you wish to proceed to a formal privacy complaint, we request that you make your complaint in writing to our Privacy Officer, by mail or email as above. We will acknowledge your formal complaint within 10 working days.

If you are in the European Union, you can choose to lodge a complaint with your local Data Protection Authority (DPA). The list of DPAs is at [http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index\\_en.htm](http://ec.europa.eu/justice/article-29/structure/data-protection-authorities/index_en.htm).