FirstAED Privacy Policy (privacy statement)

FirstAED respects your privacy. This privacy statement describes your privacy rights and our commitment to secure your personal information.

FirstAED is a Danish/European company with legal entities, business processes, management structures and technical systems, across national borders. FirstAED provides software and services to public/private companies in Europe. FirstAED's head office is located in Denmark and FirstAED is subject to European data protection legislation, including the <u>General Data Protection Regulation</u> (GDPR). All major decisions in FirstAED concerning the protection of personal data is taken at Management Level under the supervision of the Data Protection Officer. This privacy statement is available on our Website.

Scope and Acceptance

- When and in what context does this privacy policy apply?

This privacy statement applies to all business processes and to FirstAED's home page, domains, mobile solutions, cloud services and communities.

The privacy statement provides information about the data processing performed by our Customers and Controllers. It determines the purposes and means of the processing by these. Personal data is information that can identify you as a person, such as email address, mailing address or telephone number etc. We need to process your personal data in order to serve our customers. Please do not use FirstAED pages or our services if you do not agree to the way we process personal data under this privacy statement.

What data are we processing - Whose personal data is FirstAED processing?

FirstAED processes personal data of **Job seekers** and **Contacts** or **Software users t**hat are associated with our customers. We also process personal data about people who make up potential customers (**Leads**) and which are addressed to us by FirstAED website or via other channels. Our statement in these respects can be found in the section 'FirstAED as data controller. We also process data on behalf of our customers where the customer controls the processing. Our statement in these respects can be found in the section 'FirstAED as a data processor.' In this privacy statement, data subjects may also be referred to as **People** or **You.**

FirstAED as data responsible

- How do FirstAED process personal data in its role as data controller?

When a processor determines the purposes and means of the processing of your personal data, the processor shall act as the controller. This includes scenarios where FirstAED collects personal data in the context of you being a job seeker, a representative of a customer or a lead, or when you are a software user.

Why we process personal data

About customer contacts and software users

In order to generally manage our customer relationships and to meet our customer commitments, FirstAED need information about you in your role as a customer or when you use a service. The purposes of processing such personal data are:

- a) Performing the sales and contract process for customers
- b) To deliver the requested products and services to customers
- c) To conduct deliveries in accordance with agreements concluded with you or customers;
- d) To offer support to users of our products and services
- e) Improve and develop the quality, functionality and user experience of our products, services and FirstAED website

f) Detect, limit, and prevent security threats and perform maintenance and troubleshooting and debugging

- g) Preventing the misuse of our products and services
- h) To process orders, invoicing, payments and other financial follow-up
- i) Create interest profiles to promote relevant products and services

j) To establish user communities to educate and to facilitate interaction between users and FirstAED.

The legal basis for processing personal data pursuant to the above-stated purposes of letter a) to (i) is based primarily on the fact that, from a business perspective, FirstAED has a legitimate interest in processing your personal data in a manner that to our conviction do not conflict with your privacy rights and self-determination '. The legal basis for processing your personal data pursuant to the purpose specified in letter J) is your consent.

About Leads

FirstAED processes personal data on leads for marketing purposes. In order to provide targeted and relevant content to prospective customers, FirstAED builds an interest profile based on your activity and your choices and actions on FirstAED pages, as well as your response to marketing content by email. The legal basis for such processing is primarily your consent. In the sections below, you can read how we form such profiles, how to adjust the profile, and how to revoke your consent.

About jobseekers

If you are **Jobseeker**, we process personal data to evaluate your potential as a FirstAED employee. The legal basis for such processing is your consent.

About website visitors

In order to monitor access to our sites, we process personal information about visitors. The processing is based on our legitimate interest in protecting our business secrets, employees, locations and you as a visitor. You will be informed of your rights in this context when you register with our electronic system for visitors.

How we collect your personal information

Generally, FirstAED collects personal data directly from you or any other person affiliated with our customer. These people can be a manager or a colleague. If the customer you are working for buys products or services from FirstAED through a partner company to FirstAED, we may collect information about you from the partner company.

We also use cookies and other tracking technologies when using FirstAED website and when you interact with us by e-mail, to optimize your experience of FirstAED and our sites. Please see the section 'Automatic data collection tools ' for more information on how these technologies work and your rights in this context.

In some cases, we may also collect information about you from other sources. These sources can be FirstAED Marketing partners, public sources or social networks of third parties. FirstAED will be able to combine personal data about you collected from one source with information obtained from another source. This gives us a more complete picture of you, which also allows us to serve you in a more relevant way with a higher level of personalization.

Automatic data collection Tools

FirstAED uses different tracking technologies to collect information about your activities on the FirstAED site, and your interactions with us. Below are some examples.

Cookies and pixels

Cookies are small text files that contain a character string and create a unique identifier for a user. They are returned to the website and/or third parties. Most browsers are initially set up to accept cookies, since most websites are required to access them. However, you can change your browser settings so that your browser can generally reject cookies, block third-party cookies or specify when a cookie is being sent.

FirstAED is committed to ensuring your right to adjust your interests and to manage the scope of digital marketing from us through a system of preferential management.

Google Cookies and Technologies

Google Analytics: This cookie allows us to view information about website activities for users, including, but not limited to, pageviews, source, and time spent on a website. The information is anonymized and is displayed as numbers, which means that it cannot be traced back to individuals. This helps protect your privacy. By using Google Analytics, we can see what content is popular on our pages, and we strive to give you more of what you like to read and see. **Google Analytics remarketing:** Places cookies on your computer, which means that when you leave our site, Google may show you ads about FirstAED that you may be interested in based on your previous behavior on our website. This information is not personally identifiable. Google AdWords: By using Google Adwords, we are able to see which pages were helpful in leading to submissions via our contact form. This information is not personally identifiable. Google Adwords remarketing: Places cookies on your computer, which means that when you leave our site, Google may show you ads about FirstAED that you may be interested in based on your previous behavior on our website. This information is not personally identifiable. In the future, you may prevent the information generated by the Google cookie about your use of our sites from being collected and processed by Google by downloading and installing the Google Analytics Opt-out browser Add-on for your current web browser. This ADD-on is available on Https://tools.google.com/dlpage/gaoptout.

Facebook cookies

Facebook Remarketing: Facebook's tracking pixel places cookies on your computer that tell Facebook that you've checked the site. We then assume that you have an interest in FirstAED and the content on this site. When you visit Facebook, you will then be exposed to information or advertisements with similar content. Please use your privacy settings on Facebook to limit the exposure to marketing of this type.

What personal data we process

The type of personal data FirstAED processes about you may be:

- > Basic contact information, such as name, address, telephone number and e-mail
- > Employment information such as employer, title, position, including preferences and interests in a professional context;
- > Feedback, comments or questions about FirstAED or our products and services
- > Photos or video recorded at our sites
- > Content you've uploaded, such as photos and video
- > Unique user information such as login ID, user name, password and security question
- > Financial information, such as credit card details
- > Traffic information provided by your Web browser, such as the type of browser, device,

language and the address of the website you came from, and other traffic information, including IP address.

- > Clickstream-behaviour and activity on FirstAED sIDs and in our products and services
- > E-mail behavior, such as e-mail messages from FirstAED You open when and how
- > Other personal information contained in your profile that you have freely placed on third party social networks, such as LinkedIn, etc.

As a data controller FirstAED does not treat non-sensitive personal information about you.

Your rights

- What rights do you have?

The right to opt out of marketing communications

You have the right to opt out of receiving marketing communications from FirstAED and can do it either by:

i) Follow the opt-out instructions in the relevant marketing communications

ii) Change preferences under the relevant editing section for the account, if you have an account with FirstAED.

iii) Contact us by email at contact@firstaed.com

Please note that even if you opt out of receiving marketing communications, you may still receive administrative messages from FirstAED, such as order confirmations and notices necessary to manage your account or the services provided to our customers.

Fundamental rights

You have the right to access your personal data by requesting an overview of personal data about you, and you may have a right to information portability. You also have the right to request FirstAED correcting inaccuracies in your personal data.

You also have the right to request the deletion of personal data and to limit or raise objections to our processing of your personal data in accordance with this privacy statement or any other service-specific terms.

Please use <u>contact@firstaed.com</u> to submit all requests referred to in this section. Finally, you also have the right to lodge a complaint with the data protection authority regarding our processing of your personal data.

Data security and storage

- How FirstAED secures and stores your personal data?

FirstAED takes the trust you and our customers show us very seriously. FirstAED undertakes to avoid unauthorized access, disclosure or other aberrant processing of personal data. FirstAED shall ensure the confidentiality of the personal data we process, maintain the integrity of personal data and ensure its accessibility in accordance with applicable privacy laws.

As part of our commitments, we take reasonable and adequate organizational, technical and physical procedures and measures to protect the information we collect and process, taking into account the type of personal data and the risk that you and our customers are exposed to by any security breach as there is a high likelihood that the root causes of personal data breaches can be found internally, we believe that the building of a strong corporate culture in which respect and

vigilance about data protection among our employees is fundamental to ensuring the legal processing and protection of your information. The following measures are of particular importance in this respect.

How long may we keep your personal data

FirstAED retains your personal data only for as long as it is necessary for the purposes stated, while taking into account our need to respond to queries and resolve issues and comply with legal requirements under applicable law.

This means that FirstAED may store your personal information for a reasonable period after your and our customer's last interaction with us. When the personal data we have collected is no longer necessary, we delete it. We may process data for statistical purposes, but in such cases the data will be pseudonymised or anonymised.

Changes to this statement

If we change our privacy statement, we will publish the revised statement here with an updated revision date. We encourage you to review the statement regularly. If we make material changes to our statement that significantly changes our privacy practices, we may also notify you in other ways, for example, by sending an email or by posting a notice on our Corporate website and/or social media before the changes take effect.

This privacy statement was updated on 25th May 2018.

How to contact us

We appreciate your opinion. If you have any comments or questions about our Privacy statement, unresolved privacy issues and data usage or a possible breach of your personal data protection, please send them to <u>contact@firstaed.com</u>. You can also send your request in writing to: FirstAED ApS, Att. The Data protection officer, Bygaden 76B, 5953 Tranekaer, Denmark. We treat your requests confidentially. Our representative will contact you to handle your issues and outline the possibilities for a solution. Our aim is to ensure that complaints are resolved in a timely and appropriate manner.