# **Privacy Policy**

By visiting www.datatrotters.com you are consenting to our private policy.

LATEST UPDATED: December 16th, 2019.

#### 1. OVERVIEW

Corelis AS is committed to protecting your privacy online. This document describes the personal information we collect through this website at www.datatrotters.com (the "Site") operated by Corelis AS, and how we collect and use that information.

Our Private Policy is compliant to the Norwegian Personal Data Act (NO: Lov om behandling av personopplysninger) and the EU General Data Protection Regulation as implemented in Norway from the time it is implemented.

Corelis AS is referred as "we", "us" and "our", and the users of the site as "you", "your" and "user".

Corelis AS provides teaching and learning services within data literacy field described in the Site (The "Services"). Our Services are not intended to children under 13 years old.

Use of the Services including all materials presented herein and all online services provided by Corelis AS is subject to the following Privacy Policy. The Privacy Policy applies to all site visitors, customers and all other users of the site. By using the Site or Service, you agree to this Privacy Policy without modification and acknowledge reading it.

## 2. PERSONAL DATA

"Personal Data" identifies an accountholder as an individual or relates to an identifiable person. The term Personal Data shall be understood in accordance with the definition in applicable Norwegian data protection legislation.

Personal Data may include:

- Name, address, phone number, email address and other personal information (birth date, course name, employer's name, etc.)
- Completed assessments, surveys, guizzes offered on the Site
- Any feedback or comments you published on our Site

If you submit any Personal Data relating to other people to us or to our service providers in connection with the Services, you may have the authority to do so and to permit us to use the information in accordance with this Privacy Policy.

# Collection of Personal Data

We only collect the "Personal Data" you voluntary provide to us:

- Through the Site and Services: We may collect Personal Data through the Services, e.g., when you subscribe to a trial, order a game, etc.
- Offline: We may collect Personal Data from you offline, such as when you contact user support or participate to a workshop, visit us on a stand.
- From Other Sources: We may have access to some of your Personal Data from other open sources, such LinkedIn.

## Use of Personal Data

The Personal Data you provide is used to:

- to process transactions
- to deliver our Services such as sales of games or providing training
- to deliver and maintain the Services at the expected level of quality,
- to improve both the content of the Services and the user experience,
- to comply with legal obligations and processes.

#### Disclosure of Personal Data

The Personal Data of account holders may be disclosed:

- To our third party service providers who provide services such as website hosting, data analysis, information technology and related infrastructure provision, customer service, email delivery, auditing and other services. Such disclosure is always subject to a data processing agreement between Corelis AS and the third party service provider.
- To identify you to anyone with whom you share messages through the Services.
- By you, on profile pages and other services to which you are able to post information and materials. Please note that any information you post or disclose through these services will become public and may be available to other users and the general public. We urge you to be very careful when deciding to disclose any information on the Services.
- To a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock (including in connection with any bankruptcy or similar proceedings).
- To comply with legal obligations and processes.

## 3. OTHER INFORMATION

## Other Information We May Collect

"Other Information" is any information that does not reveal your specific identity or does not directly relate to an individual, such as:

- Browser and device information
- Usage data
- Information collected through cookies, pixel tags and other technologies
- Demographic information and other information provided by you
- Aggregated information

#### How We May Collect Other Information

We and our third party service providers may collect Other Information in a variety of ways, including:

• Through your browser or device: Certain information is collected by most browsers or automatically through your device, such as your Media Access Control (MAC) address, computer type (Windows or Macintosh), screen resolution, operating system name and version, device manufacturer and model, language, Internet browser type and version and the name and version of the Services (such as the App) you are using. We use this information to ensure that the Services function properly.

- Using cookies: Cookies are pieces of information stored directly on the computer that you are using. Cookies allow us to collect information such as browser type, time spent on the Services, pages visited, language preferences, and other anonymous traffic data. We and our service providers use the information only to support the internal operations of the Services, such as for security purposes, to facilitate navigation, to display information more effectively, to personalize your experience while using the Services and to recognize your computer in order to assist your use of the Services. We also gather statistical information about use of the Services in order to continually improve their design and functionality, understand how they are used and assist us with resolving questions regarding them.

  If you do not want information collected through the use of cookies, there is a simple procedure in most browsers that allows you to automatically decline cookies or be given the choice of declining or accepting the transfer to your computer of a particular cookie (or cookies) from a particular site. You may also wish to refer to http://www.allaboutcookies.org/manage-cookies/index.html. If, however, you do not accept cookies, you may experience some inconvenience in your use of the Services.
- IP Address: Your IP address is a number that is automatically assigned to the computer that you are using by your Internet Service Provider (ISP). An IP address may be identified and logged automatically in our server log files whenever a user accesses the Services, along with the time of the visit and the page(s) that were visited. Collecting IP addresses is standard practice and is done automatically by many websites, applications and other services. We use IP addresses for the purposes of providing support for the internal operations of the Services, such as calculating usage levels, diagnosing server problems, and administering the Services. We may also derive your approximate, general, location from your IP address.
- By aggregating information: The information does not personally identify you or any other user of the Services.

## How We May Use and Disclose Other Information

We may use and disclose Other Information for any purpose, except where we are required to do otherwise under applicable law. In some instances, we may combine Other Information with Personal Data. If we do, we will treat the combined information as Personal Data as long as it is combined. If we are required to treat Other Information as Personal Data under applicable law, then we may use it for the purposes for which we use and disclose Personal Data as detailed in this Privacy Policy.

## 4. THIRD PARTY SERVICES

This Privacy Policy does not address, and we are not responsible for, the privacy information or other practices of any third parties which we do not have any written agreement with, such as Facebook, Twitter, Apple, Google, Microsoft, or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including with respect to any Personal Data you disclose to these or other organizations.

### 5. SENSITIVE INFORMATION

We ask that you not send us, and you not disclose, any sensitive Personal Data (e.g., social security numbers, information related to racial or ethnic origin, political opinions, religion or other beliefs, health, biometrics or genetic characteristics, criminal background or trade union membership) on or through the Services or otherwise to us.

## 6. SECURITY

We seek to use reasonable organizational, technical and administrative measures to protect Personal Data within our organization, including adherence to principles of data protection by design and by default. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure (for example, if you have

experienced that the security of your account has been compromised), please immediately notify us by email.

#### 7. CHANGE IN PERSONAL DATA

If you would like to review, correct, update, suppress or delete Personal Data that you have previously provided to us, you may contact us by email. We will try to comply with your requests as soon as reasonably practicable.

Please note that we may need to retain certain information for recordkeeping purposes and/or to complete any transactions that you began prior to requesting a change or deletion. There may also be residual information that will remain within our databases and other records, which will not be removed.

#### 8. RETENTION PERIOD

We will retain your Personal Data for the period necessary to fulfill the purposes for which the Personal Data was collected, as outlined in this Privacy Policy.

If you choose to delete your Personal Data, your account will be placed in quarantine for 90 days. Corelis applies this quarantine period to prevent fraudulent access and other unlawful acts where accounts are deliberately or mistakenly deleted by parties other than the account holder.

After the quarantine period, we generally delete your personal data from our systems or anonymize them for further use in an aggregated format for statistical purposes. There are however two exceptions:

- For accounting reasons, we are required by law to keep for a period of time certain information regarding payment transactions.
- For security reasons, we retain information which you have personally provided to us as well as login history so that we can investigate and prevent fraud or abuse.

#### 9. MARKETING

You may opt-out from receiving marketing-related emails or other forms of messages from us by sending your request by email. We will comply with your request(s) as soon as reasonably practicable.

### 10. CROSS-BORDER TRANSFER

Your Personal Data may be stored and processed in any country where we have facilities or in which we engage service providers. If Personal Data is processed in a country outside the EU/EEA not ensuring an adequate level of data protection, we are obliged to ensure there is a legal basis for such transfer. We generally enter into EU standard contractual clauses prior to such processing unless there is another valid legal basis which can be relied on, such as the EU-U.S. Privacy Shield framework with respect to enterprises in the U.S.

#### 11. UPDATES TO THIS PRIVACY POLICY

We may change this Privacy Policy. The "LAST UPDATED" legend at the top of this document indicates when this Privacy Policy was last revised. Any changes will become effective when we post the revised Privacy Policy on the Services. You acknowledge and agree that it is your responsibility to review this Site and this Policy periodically and to be aware of any modifications. We will notify you of any changes to this privacy policy by posting those changes on this page.

### Contact information

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