

DATA PRIVACY

As the provider of the website www.brisksky.com (hereinafter "Website"), we at Brisksky ("Brisksky") are Controller as defined in applicable data protection law, more specifically the General Data Protection Regulation (EU) 2016/679 ("GDPR"), and are therefore responsible for the personal data ("Personal Data") of the Website user. As a user of the Website you consent to Brisksky use of your Personal Data under this privacy policy and you acknowledge and accept that Brisksky processes your Personal Data. Your privacy is important to Brisksky and Brisksky is committed to protecting your privacy. This privacy policy explains how Brisksky collects and processes Personal Data, what Personal Data Brisksky processes and for what purposes such data is processed.

INFORMATION ABOUT THE CONTROLLER

WWW.BRISKSKY.COM

1 WHAT PERSONAL DATA DOES BRISKSKY COLLECT?

When you access the Website and its forms, Brisksky collects information that includes your IP address, login data, the type of browser and version that you are using, the browser language, the operating system and platform, the date and time of access, commercial contact details as provided by you, the time zone setting, device type, geography and any other information transferred by you.

The Personal Data that Brisksky collects may include names, surnames, e-mail addresses, postal addresses, phone numbers, how you used our Website, length of visits, page interaction information and other Personal Data provided by you when you sign up for the services and when you use the Website. Brisksky will only process your Personal Data to the extent necessary to fulfil the services and for purposes which are compatible with providing the services, such as directing advertisement regarding the services to you.

When processing Personal Data, Brisksky complies with all applicable data protection laws, in particular (but not limited to) GDPR.

2 HOW DO WE COLLECT PERSONAL DATA AND CUSTOMER DATA?

You trust Brisksky with your Personal Data and any data that you insert in connection with the services that could be both Personal Data for your own use and other data ("Customer Data") when you register to use the services.

Brisksky also collects Personal Data using cookie files to improve and personalize your use of the services. When you use Brisksky services, Brisksky saves cookie files on your computer. Cookies are small text files that, unless you have adjusted your browser setting to refuse cookies, our system will send your device when you visit the Website. Cookies collect standard internet log information and visitor behaviour information. The cookie files help with the functionality of the Website and allow the Website to identify your browser and to recognize what preferences you have and what settings you have made.

You can access more information about cookies at www.allaboutcookies.org.

Brisksky uses the following Cookies:

Functional and Required Cookies. We use some necessary cookies because they allow visitors to navigate and key features on the site.

Analytics and Performance Cookies. We use Analytics and Performance cookies to collect information about how visitors interact with the site.

Session Cookies. We use Session Cookies to operate our Services.

Preference Cookies. We use Preference Cookies to remember your preferences and various settings.

Security Cookies. We use Security Cookies for security purposes.

3 HOW DOES BRISKSKY PROCESS YOUR PERSONAL DATA AND CUSTOMER DATA?

Brisksky only processes Personal Data to the extent necessary to provide the services and for purposes which are compatible with providing the services, such as directing advertisement regarding the services to you. Customer Data is only processed on your behalf to provide the services to you.

Brisksky stores Personal Data and Customer Data in a database. Personal Data is used to contact you and to manage your account and any payments made by you. Customer Data is only processed on your behalf and in accordance with your instructions.

When Brisksky processes Personal Data and Customer Data, Brisksky complies with all applicable data protection laws as well as any laws and regulations applicable to the services provided to you.

4 WHO HAS ACCESS TO YOUR PERSONAL DATA AND CUSTOMER DATA?

Brisksky processes your Personal Data and Customer Data confidentially. Brisksky does not sell your data to third parties. In this regard "third parties" shall not entail Brisksky subcontractors who assist Brisksky in performing the services to you. Brisksky has subcontractors such as cloud service providers, and consultants including for IT-support and accounting. Brisksky ensures that its subcontractors are liable to keep your Personal Data and Customer Data confidential.

Brisksky may further reveal your Personal Data and Customer Data to third parties, including the competent supervisory authority, if it is required by applicable data protection laws or other applicable laws and regulations.

Brisksky ensures that access to your Personal Data and Customer Data is limited to the personnel who require such access to perform the services and other processing activities which are compatible with providing the services.

Should Personal Data be submitted or stored by any third party in so called Third Countries, countries outside the EU, the Brisksky cannot guarantee that the same level of protection can be offered as that provided for by the GDPR.

5 HOW LONG DOES BRISKSKY STORE PERSONAL DATA AND CUSTOMER DATA?

Personal Data and Customer Data provided by you to Brisksky is retained for the duration of your subscription of the services and for a longer period if it is required by applicable laws, for example for any legal, accounting, or reporting requirements or purposes.

Brisksky will only store Personal Data and Customer Data for a limited period. Brisksky ensures that Personal Data and Customer Data will be deleted when it is no longer necessary to retain it to provide the services, or for purposes which are compatible with providing the services.

6 DIRECT MARKETING AND THE RIGHT TO OPT-OUT

Brisksky may process your Personal Data to provide information regarding Brisksky services to you as a Website user, including regular electronic newsletters that you can subscribe to. You have the right to object to Brisksky use of your Personal Data for direct marketing under applicable data protection laws. If you wish to object to direct marketing, please contact Brisksky by sending an e-mail to info@brisksky.com or use the unsubscribe link as provided.

7 SUBJECT ACCESS REQUESTS

You are entitled to additional information regarding Brisksky processing of your Personal Data. In case you want to know what Personal Data Brisksky stores about you and how your Personal Data is processed, please contact Brisksky by sending an e-mail to info@brisksky.com ("Subject Access Request"). If you make a Subject Access Request by electronic means, Brisksky will provide information regarding the processing of your Personal Data in a commonly used electronic form. The information provided by Brisksky shall include the following:

- ◆ The purposes of the processing;
- ◆ The categories of Personal Data concerned;
- ◆ The recipients or categories of recipients to whom your Personal Data has been or will be disclosed, in particular recipients in third countries or international organizations;
- ◆ Where possible, the envisaged period for which your Personal Data will be stored;
- ◆ Whether you are entitled to request rectification or erasure of Personal Data or restriction of processing of Personal Data or to object to the processing or to lodge a complaint with a supervisory authority;
- ◆ Where Personal Data is not collected from you, available information as to the source of the Personal Data;
- ◆ The existence of automated decision-making, including profiling;
- ◆ Where Personal Data is transferred to a third country or to an international organization, information regarding the appropriate safeguards relating to the transfer;
- ◆ A copy of the Personal Data undergoing processing.

8 RIGHTS RELATING TO THE PROCESSING OF PERSONAL DATA

You are entitled to request rectification or erasure of your Personal Data and to object to the processing of your Personal Data. You may also request restriction of processing of your Personal Data. Brisksky is required to update or rectify your Personal Data if the Personal Data Brisksky holds on you is inaccurate. Brisksky may also be required to delete your Personal Data, in example if you withdraw your consent to the processing or if the Personal Data Brisksky stores about you is incorrect or irrelevant.

Brisksky undertakes to respond to requests regarding rectification, erasure or restriction of Personal Data, as well as to objections to the processing of Personal Data, in a timely manner. When Brisksky receives a request, which is justified according to applicable data protection laws, Brisksky shall comply with the request and delete or rectify the Personal Data or restrict or cease the processing of such data.

You have the right to receive the Personal Data, which has been provided to a controller, in a structured, commonly used and machine-readable format and have the right to transmit such data to another controller without hindrance from the controller to which the Personal Data have been provided. You also have the right to lodge a complaint with a supervisory authority.

Requests under this paragraph shall be sent to Brisksky by e-mail to info@brisksky.com.

9 DATA SECURITY

Your privacy is important to Brisksky and Brisksky is committed to protecting your Personal Data and your Customer Data. Brisksky ensures that Brisksky will take all reasonable measures to protect your Personal Data and Customer Data and in particular to prevent unauthorized access to such data.

Brisksky undertakes to respond to requests regarding rectification, erasure or restriction of Personal Data, as well as to objections to the processing of Personal Data, in a timely manner. When Brisksky receives a request, which is justified according to applicable data protection laws, Brisksky shall comply with the request and delete or rectify the Personal Data or restrict or cease the processing of such data.

Brisksky wants to make you aware of the risks which are inherent in data transmissions over the Internet since such transmissions are never completely secure. When you provide your Personal Data and Customer Data to Brisksky over the Internet you are responsible for the risks of unauthorized access and loss of data which the transmission entails.

Brisksky has implemented and maintains a number of technical and organizational security

In the event that the security of the Website and the Personal Data be compromised, the Brisksky reserves the right to take any appropriate action as set out in the relevant data protection laws, including notifying you and the appropriate regulator of such a breach where required by law.

The Website may carry links to other websites that are not affiliated to nor controlled by the Brisksky. Should you access these sites from the Website, Brisksky accepts no liability or responsibility over the content, privacy policies, data handling or practices of these sites.

10 USER RESPONSIBILITY

As a Website user it is important that you are aware of your responsibility regarding the use of the services. You are responsible for protecting and updating your account information to prevent unauthorized access to your account.

You are also responsible to abide by all applicable laws and regulations. Where you process your own Customer Data which is Personal Data you act as the Data Controller, hence you are responsible for compliance with applicable data protection laws. This entails ensuring the rights of the data subjects and in particular to erase your Customer Data when you no longer need it for the purposes specified by you. If you use free text fields, you are responsible for ensuring that free text fields do not generate processing of excessive or irrelevant Personal Data. You are further responsible for your sharing of your Customer Data, for example when providing access to third parties.

The Brisksky may use third-party services in order to provide services on the Website. If you decide to enable, access or use such third-party services, be advised that your access and use of such other services are governed solely by the terms and conditions and data privacy policy of such other providers, and the Brisksky is not liable for, and makes no representations as to such other services and products, including, without limitation, their content or the manner in which they handle data (including your data) or any interaction between you and the such provider.

11 CHANGES TO OUR PRIVACY POLICY

Brisksky keeps its Privacy Policy under regular review and places any updates on this page. This Privacy Policy was last updated: 19 October 2020.

12 CONTACT

If you have any questions about Brisksky's Privacy Policy, the data we hold on you, or would like to exercise one of your data protection rights, please do not hesitate to contact Brisksky.