Data Protection Policy – FrontIoT ApS
Valid from 25 May 2018

1. Data Controller Contact information	FrontIoT ApS Rosenvængets Allé 7B 2100 København Ø www.frontiot.com Tlf.: +45 35 36 37 77 e-mail: info@frontiot.com cvr-nr.: 29509050
2. Purposes for the collection of data	- HR administration - Customer handling - Customer information (newsletter) - License handling - Supplier handling
3. Catagories of registrered persons	Personal data is being handled for the following registrered persons: - Employees, former employees, applicants - Customers, former customers, potential new customers - Customers that have bought a license from FrontIoT - Suppliers and other business partners
4. Catagories of types of personal data	- Identifications information (customer and employees) - Information regarding terms of employment for the use of administration - Contact information for customers and other business partners
5. Personal data received by the following	- SKAT (The Department of Treasury) - Pension companies - Banks and payment systems - Payroll system - Economy system - Accountant - Cloudbasered customer systems (CRM, events and analyzes)
6. Third party countries and international organisations.	Third party countries does not receive data from FrontIoT.
7. Deletion	Personal data will be deleted according to internal guidelines. FrontIoT will, of cause, delete personal data in connection with a specific inquiry. Exception to this rule is if there is a financial or legal reason to keep data.
8. Technical and organisational safetyprocurtions	The handling of personal data is conducted according to internal guidelines that states the rules for autorization, access control and logging. Backup and restoration procedures have been implementet for all vital servers. Physical material is stored safely.

1. Data Controller

FrontIoT ApS

See contact information above.

2. Description of why personal data is being collected

Contact information for our customers, suppliers, employes and applicants. The data is used for the ungoing contact in connection with support, sale and similar tasks.

3. FrontIoT has collected personal data regarding the following groups:

Employees, former employees, and job applicants.
Customers, former customers and potential new customers.
Customers that have a license controlled by FrontIot.
Suppliers and other business partners.

4. What type of personal data is FrontIoT collecting and why.

FrontIoT only stores personal data (the definition estableshed in the EU GDPR regulation). That is why it has not been necessary to appoint a Data Protection Officer. Personal data is only kept in order to handle customer, supplier and employee information.

5. Who does FrontIoT forward data to. Legal requirements.

FrontIoT has signed Data Processing Agreements with relevant partners.
Documentation can be found with FrontIoT.
Please see form above for further information.

6. FrontIoT does not send personal data to third party countries.

7. Deletion and exceptions to the general rules of deletion.

Financial posting information (such as invoices, receivables, korrespondance, payment details and similar information that is necessary in order to be able to document our accounting)
• we keep personal data for 5 years from the end of the financial year as required by the accounting law.

If it is deemed necessary we can keep the information for a longer period. This has to be based on a specific evaluation of the reason to keep information longer. This is in case of possible disputes with customers, suppliers and other business partners.

Personal data in connection with the handling of licenses will be kept for as long as a license is active. When it is no longer active the information will be deleted according to the rules of deletion stated in the deletion procedures of FrontIoT.

8. Description of how Frontlot is handling the security in relation to personal data. Such as firewalls, passwords, encryption.

FrontIoT has firewalls. The servers and work stations are furthermore password protected.

In conection with our newsletter Frontlot stores cookie information as long as the user is active. When the user unsubscribes the newsletter the data will be anonymized.

For further information please see above form.

9. Your rights. (From EU Commission homepage)

The Data Protection Regulation contains a number of rights that you can use when dealing with the Data Controller.
As a registrered person you now have the following rights.

- **information** about the processing of your personal data;
- **obtain access to** the personal data held about you;
- ask for incorrect, inaccurate or incomplete personal data to be **corrected**;
- request that personal **data be erased** when it's no longer needed or if processing it is unlawful;
- **object** to the processing of your personal data for marketing purposes or on grounds relating to your particular situation;
- request the **restriction** of the processing of your personal data in specific cases;
- receive your personal data in a machine-readable format and send it to another controller ('**data portability**');
- request that decisions based on **automated processing** concerning you or significantly affecting you and based on your personal data are made by natural persons, not only by computers. You also have the right in this case to express your point of view and to contest the decision.

To exercise your rights you should contact the company or organisation processing your personal data, also known as the controller. If the company/organisation has a Data Protection Officer ('DPO') you may address your request to the DPO. The company/organisation must respond to your requests without undue delay and **at the latest within 1 month.** If the company/organisation doesn't intend to comply with your request they must state the reason why. You may be asked to provide information to confirm your identity (such as, clicking a verification link, entering a username or password) in order to exercise your rights.

These rights apply **across the EU**, regardless of where the data is processed and where the company is established. These rights also apply when you buy goods and services from non-EU companies operating in the EU.

Please be aware tht there that there in some circumstances can be exceptions to the rights.

You can read more on home page for the European Commission: What are my rights?