

Growblocks Privacy and Cookie Policy

1. Introduction

At Growblocks ApS, Købmagergade 60, 1150 Copenhagen K, CVR 42559806 ("**Growblocks**"), we understand the importance of processing personal data securely and confidentially. This Privacy Policy is intended for our customers, suppliers, business partners, website visitors, and other persons with whom we interact. Growblocks is committed to complying with the requirements and obligations relating to the processing of personal data under applicable law, including the General Data Protection Regulation ("**GDPR**"). We have therefore implemented appropriate procedures to protect your personal data.

Growblocks is the data controller for the processing of your personal data. This Privacy and Cookie Policy ("**Privacy Policy**") provides an overview of Growblocks' processing activities, including the purposes and legal basis of the processing.

If you have any questions in relation to this Privacy Policy, or if you wish to exercise your rights under Chapter III of the GDPR in accordance with para. 6 of this Privacy Policy, please contact Growblocks at security@growblocks.com.

2. Processing activities

2.1 Website visitors

2.1.1 What personal data do we process and for what purposes

When you visit Growblocks' website, <https://growblocks.com/>, ("**Website**"), Growblocks will be processing personal data about you, such as cookies, browser information, IP address and time spent on the website. We use cookies among other things, to improve your user experience and the functionality of our Website, to compile statistics, to target advertisements to your needs, and to remember your preferences. You can read more about our use of cookies in para. 5 below.

2.1.2 Legal basis

The legal basis for the processing of your personal data is Growblocks' legitimate interests, which, in Growblocks' view, are not overridden by your fundamental rights and freedoms as provided in Article 6(1)(f) GDPR. The legitimate interests pursued by Growblocks are to make a well-functioning website available, to provide a unique user experience, and to engage in

marketing activities. In some cases, the legal basis is your consent, which you will be asked to give when you visit our Website as provided in Article 6(1)(a) GDPR.

2.1.3 Disclosure of personal data

Growblocks will in certain cases disclose your personal data to other group companies, business partners or other partners for business purposes. Such third parties include, e.g. social media providers as specified in para. 4 below.

Additionally, your personal data will be processed by certain third parties, among them the provider of the technical solution behind our Website, on Growblocks' behalf and in accordance with Growblocks' instructions and the obligations laid down in the data processing agreement concluded with Growblocks. These data processors may not process your personal data for their own purposes.

2.1.4 Storage of personal data

Personal data collected via cookies during visits to our Website are stored for different periods of time depending on the type and purpose of the cookie. For details, see para. 5 below.

Personal data collected using social media will be deleted as soon as the content in question is deleted or when you remove your reaction to our content (like, share, etc.). For details, see para. 4 below.

2.2 Recipients of newsletters and other marketing communications

2.2.1 What personal data do we process and for what purposes

If you wish to receive our newsletter, or **subscribe** to other marketing communications, we will process the following personal data about you: First name, last name, job title, and your e-mail address. The purpose of the processing is to enable us to customise the contents of our newsletters/other communications and to send them.

2.2.2 Legal basis

The legal basis for our processing of personal data about you is our legitimate interests in the marketing of our products and services, see Article 6(1)(f) GDPR. You can withdraw your consent to receiving our newsletter at any time. To unsubscribe from our newsletters, please use the link included in each newsletter or contact us at security@growblocks.com.

2.2.3 Disclosure of personal data

Certain third parties, among them the provider of the technical solution helping us deliver and handle newsletters, will process personal data about you on Growblocks' behalf and in accordance with Growblocks' instructions and the obligations laid down in the data processing

agreement concluded with Growblocks. These data processors may not process your personal data for their own purposes.

2.2.4 Storage of personal data

Personal data in relation to your newsletter profile will be stored until such time as you withdraw your consent and no longer wish to receive newsletters from us.

2.3 Contact persons at (potential) customers, suppliers, and other business relations

2.3.1 What personal data do we process and for what purposes

As a contact person at one of our (potential) customers, suppliers, or other business relations, Growblocks will process personal data about you when you communicate with Growblocks, for example via emails in the context of Growblocks' (potential) contractual relationship with the company by which you are employed or in the context of the conclusion or termination of a contract. Growblocks will process general personal data about you, including your name and surname, email address, telephone number, job title, etc.

2.3.2 Legal basis

The legal basis for the processing of your personal data is Growblocks' legitimate interests, which, in Growblocks' view, are not overridden by your fundamental rights and freedoms as provided in Article 6(1)(f) GDPR. The legitimate interests pursued by Growblocks are the performance of our contractual obligations, the making, maintenance and strengthening of our customer relationships, the invoicing of the services provided to Growblocks by the company you are employed by and vice versa, and for documentation purposes where an agreement is concluded by email.

In certain cases, the processing of your personal data is necessary to comply with a legal obligation imposed on Growblocks, for example in connection with the storage of accounting records under the Danish Bookkeeping Act. In such cases, the legal basis is Article 6(1)(c) GDPR.

2.3.3 Disclosure of personal data

Growblocks will in certain cases disclose your personal data to other group companies, business partners or other partners for business purposes. Such third parties include, inter alia, social media providers as specified in para. 4 below.

In certain specific cases, e.g. in the context of disputes, including where disclosure is necessary for the establishment, enforcement, or defence of Growblocks' legal claims, Growblocks may disclose your personal data to advisors or other relevant third parties, if deemed lawful and necessary.

2.3.4 Storage of personal data

If you are a contact person of one of Growblocks' customers, suppliers or other business associates, Growblocks will process personal data about you for as long as Growblocks is communicating with you because you are our contact person, for three years after termination of the contractual relationship, or until your personal data is no longer necessary for the establishment, exercise or defence of legal claims.

If your personal data are included in Growblocks' accounting records, e.g. in connection with invoicing, your data will be stored for five years from the end of the financial year to which the accounting records relate. This is to ensure compliance with our legal obligations under the Danish Bookkeeping Act.

2.4 Customer service

2.4.1 What personal data do we process and for what purposes

When you contact our customer service, we will process the personal data you provide to us in order to handle your inquiry. This will typically be your name, telephone number, email address, and the contents of your inquiry.

Growblocks will not process special categories of personal data (sensitive personal data) about you, e.g. health data, unless you have provided such data yourself. Growblocks kindly asks that you do not send any sensitive personal data to us.

2.4.2 Legal basis

The legal basis for the processing of your personal data is Growblocks' legitimate interests in providing customer service and developing our business, which, in Growblocks' view, are not overridden by your fundamental rights and freedoms as provided in Article 6(1)(f) GDPR.

2.4.3 Disclosure of personal data

In certain specific cases, e.g. in the context of disputes, including where disclosure is necessary for the establishment, enforcement, or defence of Growblocks' legal claims, Growblocks may disclose your personal data to advisors or other relevant third parties, if deemed lawful and necessary.

Additionally, your personal data will be processed by certain third parties on Growblocks' behalf and in accordance with Growblocks' instructions and the obligations laid down in the data processing agreement concluded with Growblocks. These data processors may not process your personal data for their own purposes.

2.4.4 Storage of personal data

Inquiries from potential customers will be deleted 18 months after the inquiry is resolved, unless a longer retention period is required for documentation purposes, e.g. to a dispute, including for the establishment, exercise, or defence of legal claims.

Inquiries from existing customers will be deleted three years after termination of the contractual relationship, unless a longer retention period is required for documentation purposes, e.g. to a dispute, including for the establishment, exercise, or defence of legal claims.

3. Transfer of personal data to third countries (countries outside the EU/EEA)

In certain cases, your personal data may be transferred to countries outside the EU/EEA. Growblocks will ensure that the transfer takes place in accordance with applicable data protection law. This entails that any party outside of the EU/EEA that will receive your personal data will ensure an adequate level of protection, for example, by entering into the EU Commission's Standard Contractual Clauses ("SCCs") with Growblocks. Growblocks will ensure the implementation of additional safeguards if deemed necessary on a case-by-case basis.

You can request a copy of the legal basis for the transfer by contacting us at security@growblocks.com.

4. Social media

Our Website features integrated plug-ins from the social media LinkedIn and YouTube. When you visit any of our social media pages or our Website with integrated plug-ins, the social media providers will collect and process personal data by means of cookies, provided you have consented to the use of cookies. Such collection and processing of personal data will take place whether you have a social media profile or not.

If you access our Website, which features integrated social media plug-ins, your browser will contact the server of that social medium, load the visual presentation of the plug-in and present the content to you. While this is happening, the social media provider will receive information about your use of the Website, as well as additional personal data, such as your IP address. Growblocks will receive anonymous demographic and geographic statistics from the social media provider about visitors to our Website and our social media pages.

Growblocks is a joint data controller together with the social media providers for the processing of personal data in connection with visits to our social media pages and our Website. This means, i.e., that you can contact both Growblocks and the social media provider if you wish to exercise your rights under the GDPR. LinkedIn and YouTube have primary responsibility for ensuring compliance

with the GDPR and for responding to requests to exercise data subjects' rights. If you have a social media profile, you can exercise your rights through your account settings.

We have no influence on the amount of personal data that the social media provider collects via the active plug-ins. For details, please refer to the relevant privacy policy:

- LinkedIn: <https://www.linkedin.com/legal/privacy-policy>
- YouTube: <https://policies.google.com/privacy?hl=en>

5. Use of cookies

The first time you visit our Website, <https://growblocks.com/>, you will be asked to consent to the use of cookies or to reject the use of some or all cookies. Please note that the use of functionality cookies does not require your consent as such cookies are necessary to ensure the functioning of our Website. We encourage you to accept the use of cookies on our Website, as it helps us improve yours and other users' experience on the Website. If you reject the use of cookies, certain Website features may not be available to you.

When you use our Website, we do not record any information that can directly identify you, such as your name and address. We do, however, record information about how you navigate the Website so that we may learn more about how our Website is used, and we also record your IP address, which may indirectly identify you.

5.1 What is a cookie?

A cookie is a small text file sent to your browser from our Website and stored on your computer, phone or other device that you use to access the Internet.

Please note, however, that the word "cookies" as used in this Privacy Policy and in the consent text on our Website includes other forms of automated data collection as well, e.g. Flash cookies (locally shared object), HTML5, JavaScripts, or cookies placed using other forms of software. The word "cookies" also refers to information about MAC addresses and other information about your device.

Cookies come in two types: Session cookies and persistent cookies. Session cookies are units of information that are deleted when you close your browser. Persistent cookies are units of information that are saved on your computer until deleted. Persistent cookies will delete themselves after a certain period but will be renewed each time you visit our Website. Growblocks uses both session and persistent cookies. You can read more about what specific cookies we use in the Cookie Declaration below.

5.2 Purpose of cookies

Cookies can be used for a variety of purposes but are mainly used to store information about your activity on the internet. Cookies contain information that can later be read by a server on the Internet domain that issued the cookie. This means that the relevant website will remember you the next time you visit it.

We use cookies on the Website for the purposes of improving your user experience and our products, providing, and improving functionality, generating statistics, analysing the performance of the Website, remembering your preferences, marketing our services, tracking your geographical location, and customising our social media ads. The advantage for you is that you will save time the next time you visit the Website as you will not have to enter the same information again, and the content will be adapted to your preferences.

5.3 For how long are cookies stored?

Cookies delete themselves after periods of varying lengths but are automatically updated when you visit our Website again. Information about your online behaviour, including cookies, will be deleted at different intervals, see the Cookie Declaration below for details.

5.4 Third party cookies

In order to further develop and improve the Website, we use cookies from certain third parties. The purposes are compilation of statistics and analysis of online behaviour. The third parties place the cookies on your computer and compile the statistics, etc., on our behalf. The third parties are identified in the Cookie Declaration below.

5.5 Cookie Declaration

The Cookie Declaration can be found here: <https://growblocks.com/cookiedeclaration/>

5.6 Opting out of cookies

You can always refuse or opt out of having cookies placed on your computer by changing your browser settings or by visiting our cookie declaration page here:

<https://growblocks.com/cookiedeclaration/>

However, please know that if you do so there will be many features and services on our Website that you will not be able to use because they require that the Website remembers the choices you make.

Cookies that you have previously accepted can be easily deleted afterwards. If you are using a computer with a new or fairly new browser, you can delete your cookies using shortcut keys CTRL + SHIFT + Delete. If the shortcut keys do not work, and/or if you are using a MAC, please first find

out which browser you are using and then click on the relevant links with instructions on how to opt out of cookies:

- [Guide - Firefox](#)
- [Guide - Google Chrome](#)
- [Guide - Edge](#)
- [Guide - Safari](#)
- [Guide - Explorer](#)

Please note that you must delete cookies in all your browsers if you are using more than one browser.

6. Your rights

We have taken a number of measures to protect your personal data and safeguard your rights. Because of our processing of personal data about you, you will have the rights described below. However, some rights apply only in certain circumstances. The Danish Data Protection Agency has issued guidance on the rights of data subjects. For details about your rights, please see [here](#) (in Danish).

- You have the right to request access to, and receive a copy of, the personal data that we are processing about you and, in this context, also to receive a range of additional information.
- You have a right to have incorrect personal data about yourself rectified and to have incomplete personal data completed.
- You have the right to request that personal data about you be deleted in certain circumstances, e.g. if processing is based on your consent and you choose to withdraw that consent.
- You have a right to have the processing of your personal data restricted, e.g. if the accuracy of the personal data is contested.
- Where our processing is done automatically and is based on your consent or the performance of an agreement with you, you **have** the right to request to receive the personal data that you have provided to us in a structured, commonly used, and machine-readable format and to request the transmission, where technically feasible, of such data to another controller.

- You may object to the processing of your personal data by us, including in particular in relation to direct marketing.
- You may request not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning you or similarly significantly affects you.
- You may withdraw your consent to the processing of your personal data at any time. Withdrawal of your consent will not affect the processing of your personal data that took place before the date of withdrawal, however.

If you wish to exercise any of the above rights, or if you wish to withdraw your consent, please feel free to contact us at security@growblocks.com.

7. Questions or complaints

If you have any questions about this Privacy Policy or if you wish to exercise any of your rights as explained above or if you disagree with the way we process personal data about you, please contact Growblocks at security@growblocks.com.

If you disagree with the way in which Growblocks processes your personal data, you may file a complaint with the Danish Data Protection Agency, using the contact details that are available [here](#). However, we hope that you will contact us first, using the **above** contact details, so that we may try to come to an agreement.

8. Amendments to this Privacy Policy

This Privacy Policy is regularly updated and amended, including as required on account of changes to statutes, practices and rules and regulations on the data protection area. You are advised, therefore, to stay up-to-date on the contents of this Privacy Policy at all times.

Last changed: March 2023