

## *Findable – Site privacy notice*

### **1. About us**

- 1.1 Findable AS (**Findable, we, our or us**) is a company providing a service for organising, safe keeping and access to documentation. Findable is committed to providing a high standard of data protection. It is registered as a company in Norway with address Axel Huitfeldts vei 6, 1170 Oslo. This privacy policy is applicable to all Findable companies, and it explains what information we collect about you, how we use it, and your rights.
- 1.2 Findable is a data controller of the use of personal data described in this privacy notice.
- 1.3 Findable does not intend to collect any information in relation to your race or ethnic origin, political opinions, religious or philosophical beliefs, trade union memberships, health, sex life or sexual orientation, genetic or biometric data. Please assist us by not providing this information to us.

### **2. Types of personal data we collect**

- 2.1 **Customer Data:** All data, including for example text, data and images, that are provided to us by or on behalf of our customer in relation to our automated building documentation services (the **Solution**).
- 2.2 **Account Data:** Authorized user's name, contact information, username and password and interactions with the Solution.
- 2.3 **Marketing Data:** Name, contact information, interests, and other related data relevant for sending marketing communications.
- 2.4 **Transaction Data:** Customer's representative's name, e-mail address, address, phone number and other relevant personal details to complete a sale of our product to the customer.
- 2.5 **Technical Data:** Site user's IP address, pages viewed, linked clicked and other interaction on websites, and other information collected automatically, using cookies or other tracking technologies.

### **3. Our automated building documentation service**

- 3.1 As part of providing our automated building documentation services, i.e. the Solution, we collect and process Customer Data to supply information to our customers for a variety of reasons, including maintenance, due diligence, and certification. We do not look for or specifically extract any personal data from Customer Data.
- 3.2 When processing Customer Data and other personal data for the purpose of providing the services to our customer, we act as a data processor for the customer. For our use of the data for the purposes described below, we act as a data controller.
- 3.3 **User administration and security:** We use Account Data to administer authorized users in the Solution to ensure that the use of the Solution is in accordance with the Terms of Service, including to send out service messages, and to maintain the security of the Solution, including to avoid unauthorized use of the Solution and to maintain

necessary backups to restore the Solution if necessary. The legal basis for this processing is our legitimate interests in providing and ensuring the security of the Solution.

3.4 **Improving our products and services:** Customer Data is used to train algorithms and otherwise improve our products and services, including the Solution, and the legal basis is our legitimate interests in improving our products and services.

4. **Other commercial purposes:** We aggregate Customer Data to use the aggregated data to create statistics and analyses of the data, including to create and use datasets for further training of the Solution and create new products and services, based on our legitimate commercial interests in doing so.

## 5. Business administration and customer service

5.1 **Order processing and invoicing:** We process Transaction Data to process orders by our customers and to invoice our customers. This processing is based on our legitimate interests in providing correct products and services to our customers and to ensure correct billing.

5.2 **Customer service:** You can contact us to request customer service. To effectively respond to your customer service request and need, we process personal data. The nature of the request determines which personal data are relevant, such as Customer Data, Account Data and/or Transaction Data, or other personal data. The legal basis for our processing is our legitimate interests in providing good and efficient customer service.

## 6. Compliance

6.1 **Legal obligations:** We process personal data, including Account Data and Transaction Data, to comply with our legal and regulatory obligations, including accounting obligations. The legal basis for such processing is the legal obligations in question.

## 7. Websites and cookies

7.1 We collect Technical Data via or in connection with our website findable.no and its subdomains (**Site**). We use cookies and similar technology, and we obtain your consent for placing cookies and processing personal data through cookies. You can give or withdraw consent at any time through the settings in your Web browser.

7.2 Cookies are small files that a Site or its service provider transfers to your computer's hard drive through your Web browser (if you allow) that enables the Sites or service providers systems to recognize your browser and capture and remember certain information.

7.3 We use the following cookies and technologies on our Site:

1. Name	2. Purpose	3. Types of data processed	4. Recipients	5. Duration
6. _ga	7. analytics	8. Website interactions	9. Google	10. 2 years

11. ajs_user_id	13. analytics	14. Website interactions	15. Segment	16.
12. ajs_anonymous_id				
17. intercom-session-sqtv3tmr	19. user support	20. User queries, email	21. Intercom	22.
18. intercom-device-id-sqtv3tmr				
23. ANONCHK, SM	24. analytics	25. Website interactions	26. Clarity	27.
28. CLID	29. analytics	30. Website interactions	31. Clarity	32.
33. MUID	34. analytics	35. Website interactions	36. Clarity	37.
38. SRM_B	39. analytics	40. Website interactions	41. Clarity	42.

## 8. Marketing and market research

### 8.1 Marketing messages

8.1.1 From time to time we send our customers marketing messages by email, phone or post with information about our new and existing products and services. Some of these messages may be tailored to you, based on your previous use of our Site, and other information we hold about you.

8.1.2 The legal basis for sending marketing messages is your consent. If you are an existing customer, our legal basis is your legitimate interests in promoting our products and services.

8.1.3 You can opt out of receiving marketing messages at any time. You can do so by sending us an email to support@findable.no with 'unsubscribe' in the subject line. If you unsubscribe from marketing, please note that we may still contact you with service messages from time to time (e.g. information about the operative status of our service or about your legal rights).

8.2 **Market research:** We may contact representatives of existing or prospective customers to obtain feedback about our products and services. For this purpose we will use Account Data and Marketing Data. It is voluntary to respond to such requests. The legal basis for sending requests for feedback is your consent. If you are a representative of an existing customer, our legal basis is your legitimate interests in researching our products and services.

## 9. How do we protect your information?

9.1 We implement a variety of security measures to maintain the safety of your personal information when you place an order or enter, submit, or access your personal information.

9.2 We offer the use of a secure server. All supplied sensitive/credit information is transmitted via Secure Socket Layer (SSL) technology and then encrypted into our

Payment gateway providers database only to be accessible by those authorised with special access rights to such systems and are required to keep the information confidential.

## **10. Your Rights**

10.1 You may have certain rights in respect of your personal data.

10.1.1 You can request from us confirmation of whether we are processing your personal data, and if so, access that information.

10.1.2 You can also ask us to rectify any of your personal data which is incorrect, and we are keen to ensure all our data is accurate and up to date.

10.1.3 You can also request to have personal data about you erased.

10.1.4 You may have the right to restrict processing of your personal data, or to have transferred a machine-readable copy of your personal data, in certain circumstances.

10.1.5 You may also have the right to object to your personal data being used for certain purposes, including to send you marketing. See 'Marketing' above, for more details of how to opt-out of marketing. If your objection is successful, you may also have your data erased.

10.1.6 To the extent our processing is based on your consent, you can withdraw your consent at any time. If you withdraw your consent, it does not affect the legality of our processing prior to the withdrawal, nor our processing not based on consent.

10.1.7 You are entitled to contact your local supervisory authority for data protection. However, we hope that you choose to contact us first with any concerns regarding our processing of personal data about you.

10.2 We will comply with any requests to exercise your rights in accordance with applicable law. Please be aware, however, that there are various limitations to these rights, and there may be circumstances where we are not able to comply with your request.

10.3 If you would like to make a request in relation to these rights, please email us at [support@findable.no](mailto:support@findable.no). In some instances, we may request verification of your identity from you to help us respond to your request.

## **11. Who do we share your personal data with?**

11.1 We share personal data with third parties in the following ways:

11.1.1 With our suppliers and service providers working for us, e.g. regarding payment processing, information gathering, CRM, hosting, support, advertisement and marketing, AI training, operations management, software development, and communication.

11.1.2 With third parties engaged in fraud prevention and detection.

- 11.1.3 Where we provide licensed content on our service, with our partners who provide that service.
- 11.1.4 To law enforcement or other government authorities, e.g. to report a fraud or in response to a lawful request.
- 11.1.5 To protect ours or others' rights, property, or safety.
- 11.1.6 To our professional and legal advisers.
- 11.1.7 If we sell any business assets, the personal data of our customers may be disclosed to a potential buyer.
- 11.1.8 Otherwise where we have your consent or are otherwise legally permitted to do so.
- 11.2 We take steps to ensure that our third parties agree to keep this information confidential and observe a similar high standard of data protection. We do not sell, trade, or otherwise transfer your personal data to outside parties.
- 11.3 We use trusted third parties based in Europe and in countries outside Europe. Consequently, your personal data may be processed in countries outside of Norway, including in countries where you may have fewer legal rights in respect of your data than you do under local law. Please contact us if you would like more information about the safeguards to protect your personal data.

## **12. How long do we keep your personal data?**

- 12.1 We will keep your personal data for as long as we need it for the purposes set out above, and so this period will vary depending on the purpose in question.
- 12.2 For example, where you have made a purchase with us as a representative for a customer, we will keep a record of your purchase for the period necessary for invoicing, tax and warranty purposes. We may also keep a record of correspondence with you (for example if you have made a complaint about our product) for as long as is necessary to protect us from a legal claim.
- 12.3 Where we no longer have a need to keep your information, we will delete it. Please note that where you unsubscribe from our marketing communications, we will keep a record of your email address to ensure we do not send you marketing emails in future.

## **13. Third-party links**

- 13.1 Occasionally, at our discretion, we may include or offer third party products or services on our Site. These third-party sites have separate and independent privacy policies. We therefore have no responsibility or liability for the content and activities of these linked Sites. Nonetheless, we seek to protect the integrity of our Site and welcome any feedback about these Sites.

## **14. Changes to our Privacy Policy**

- 14.1 If we decide to change our privacy policy, we will post those changes on this page, and/or update the Privacy Policy modification date below.



14.2 This policy was last modified on 5 January 2023.

**15. Contacting Us**

15.1 If there are any questions regarding this privacy policy you may contact us by email us at [support@findable.no](mailto:support@findable.no) or write to us at Findable AS, Axel Huitfeldts vei 6, 1170 Oslo, Norway.