External Privacy Policy

Document Owner: Emil Rasmussen, CTO

We are handling your personal data. This privacy policy is to inform you about how we process your data.

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Contact Information

Name and address:
Enterspeed A/S
P.O. Pedersens Vej 2
DK-8200 Aarhus N
Company Registation Number: DK44904853
Website: www.enterspeed.com

(the ”Organisation”)

Introduction

This Data Protection and Privacy Policy (the “Policy”) describes how ENTERSPEED A/S (“us”, ”we” or ”our”) when acting in the role of a controller, collects and processes your personal data relating to the purchase of services, membership, products, or your use of our website.

The Policy is prepared and made available to comply with the General Data Protection Regulation (2016/679 of 27 April 2016) (the ”GDPR”) and the rules included herein on information to be provided to you.

Types of personal data processed

We process personal data about you when this is necessary and in accordance with the applicable legislation. Depending on the specific circumstances, the processed personal data include the following types of personal data:

- name
- address
- telephone number

- email
- username
- password
- invoicing and bookkeeping data and documentation
- payment card details
- IP addresses
- account status (customer points, payments etc.)

When relevant, personal data is collected directly from you or from external sources. Personal data is collected from publicly accessible LinkedIn profiles and publicly accessible websites.

If we need to collect more personal data than specified above, we will inform you by updating this Policy.

Purposes of processing the personal data

We will only process your personal data if we have a legitimate purpose and in that case in accordance with the rules of the GDPR. The personal data we collect about you is processed for the following purposes:

- To deliver products or services.
- To respond to inquiries or complaints.
- To store personal data to comply with applicable legislation requirements such as bookkeeping acts.
- To send newsletters and direct marketing (such as e-mails, MMS', direct messages on social media, etc.)
- To send newsletters by e-mail.
- To provide service messages and information.
- To provide support and service messages, including responding to questions and complaints and sending updates about our products and services.
- To facilitate a sales process.
- To improve our products, services, or website.
- To perform profiling of users, customers or members to analyse and predict their preferences and/or behaviour.

Legal basis for processing personal data

We only process your personal data when we have a legal basis to do so in accordance with the GDPR. Depending on the specific circumstances, the processing of personal data is done on the following legal basis:

- The legal basis for the processing of such personal data is consent, in accordance with GDPR, Article 6(1)(a). You can withdraw your consent at any time by contacting us via the contact details provided at the end of this Policy. If you withdraw your consent, the personal data processed will be deleted, unless it can or must be processed in order to comply with legal obligations.
- The processing is necessary for the performance of a contract to which the data subject is a party in accordance with GDPR, Article 6(1)(b), the first indent.
- The processing is necessary to comply with applicable legislation in accordance with GDPR, Article 6(1)(c).

- The processing is necessary for the purposes of the legitimate interests where such interests are not overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data in accordance with GDPR, Article 6(1)(f).
- The processing is necessary in order to take steps at the request of the data subject prior to entering into a contract in accordance with GDPR, Article 6(1)(b), last indent.

In addition to the above, in some instances we integrate personal data collected from different sources. Before we perform such processing, we will collect a consent hereto. We perform this processing activity for the following purposes: For users, potential and current customers - that have given their consent - we track behaviour on our website (enterspeed.com) so we can communicate and show ads as relevant as possible.

In addition to the above, in some instances we analyse individual customers' or users' personal preferences and/or behaviour with the purpose of using such analyses for marketing, sales or similar commercial activities. Before we perform such processing, we will collect a consent hereto. We perform this processing activity for the following purposes: For users, potential and current customers - that have given their consent - we track behaviour on our website (enterspeed.com) so we can communicate as relevant as possible for marketing and sales purposes.

If we send you direct marketing, including by email, we will ask for your prior consent in accordance with the applicable rules such as marketing acts.

Disclosure and transfer of personal data

We only transfer personal data to other entities when it is legally permitted or required.

We transfer personal data to the following recipients from the EU/EEA:

- Processors
- Suppliers
- Collaborators

From time to time we use external entities as suppliers to assist us in delivering our services. The external suppliers will not receive or process personal data unless applicable law allows for such transfer and processing. Where the external parties are acting in the role of processors, the processing is always based on a data processing agreement in accordance with the requirements under GDPR.

Where the external parties are acting in the role of controllers, the processing of personal data is based on such external parties' data privacy policy and the relevant legal bases which the external parties are obligated to inform about unless the applicable legislation allows otherwise.

We transfer personal data to countries or international organisations outside the EU/ EEA. We transfer Personal Data to the following countries on the basis of the European Commissions adequacy decisions under article 45:

- USA (where the recipient is certified via the EU-US Data Privacy Framework)

As such adequate data protection is guaranteed through legislation or through other measures.

If you have any questions about our use of processors, cooperation with other controllers, including our subsidiaries, or the transfer of data to third countries, you may contact us for more information or documentation of our legal basis for such transfers.

Erasure and retention of personal data

We ensure that the personal data is deleted when it is no longer necessary for the processing purposes described above. However, we retain your personal data to the extent that we are legally obligated, as is the case with for example accounting and bookkeeping materials and records. If you have any questions about our retention of your personal data, you may contact us by using the email mentioned in the last section of this Policy.

Data subject rights

As a data subject under GDPR, you have several rights:

- You have the right to request access to the personal data we process about you, the purposes we process the personal data, and whether we disclose or transfer your personal data to others.
- You have the right to have incorrect information rectified.
- You have the right to have certain personal data deleted.
- You may have the right to restriction of our processing of your personal data.
- You may have the right to object to our processing of your personal data based on reasons and circumstances that pertain to your particular situation. Objection can also be to the processing of personal data for the purpose of direct marketing.
- You have the right not to be subject to a decision based solely on automated means, without human interference unless the decision (1) is necessary for entering into, or performance of a contract between you and the Organisation, (2) is authorised by law, or (3) is based on your explicit consent.
- If the processing of your personal data is based on your consent, you are entitled to withdraw such consent at any time. Withdrawal of your consent will not affect the lawfulness of the processing carried out prior to your withdrawal.
- You are entitled to receive personal data which you have provided to us in a structured, commonly used, and machine-readable format (data portability).
- You can always lodge a complaint with the data protection authority.

Your rights may be subject to conditions or restrictions. Accordingly, there is no certainty that you will be entitled to for example data portability in the specific situation; it will depend on the circumstances of the processing.

More information about data subject rights can be found in the guidelines of the national data protection authorities.

Please use you the contact details below if you want to use your rights.

We try to meet your wishes about our processing of personal data, but you can always file a complaint to the data protection authorities.

Changes to this Policy

We reserve the right to update and amend this Policy. If we do, we correct the date and the version at the top of this Policy. If we make significant changes, we will provide notification by way of a visible notice, for example on our website or by direct message.

Contact

You may contact us at the below specified email if you:

- disagree with our processing or consider our processing of your personal data infringes on the law,
- have questions or comments to this Policy, or
- want to invoke one or more of your rights as a data subject described in this Policy.

If you have questions or comments to this Policy or if you would like to invoke one or more data subject rights, please contact us at security@enterspeed.com.

Version	Date	Reviewer	Approver
Previous versions created in ComplyCloud.			
10.0	28 May 2025	Emil Rasmussen, CTO	Emil Rasmussen, CTO