PRIVACY STATEMENT

Last updated: 12/03/2021

The Privacy Policy describes what personal data we collect when purchasing and licensing our products and services, as well as how we process them.

By purchasing and using, Ablecon AS's products and services, you acknowledge to have read, understood, and agree to the content of this Statement.

PERSONAL DATA AND LIABILITY

Data controller:

AbleCon AS, Trudvangveien 67, 3117 TØNSBERG, NORWAY

Email: post@ablecon.no

Phone: +47 47974100

Data Protection Officer:

Egil Edwin	Arnfinn Kalvenes
Teacher for Visual Impaired	CEO
E-mail: <u>egil@ablecon.no</u>	arnfinn@ablecon.no

We only collect name and contact information about our customers. We generally do not know who the user of our products is, but only who the device is purchased by. If Ablecon AS has been assigned to install and provide easy training in the use of the aid, our professionals can know through this who the user is, but this information is not stored at Ablecon AS. All future follow-up through support and training is given on behalf of the buyer of the system, Accordingly, Ablecon AS only collects data necessary for good support and proper billing.

Data collected:

- Name of purchaser, purchase order number and reference number.
- Contact information of the installer (when activating a license). When activating a license, you must approve Ablecon AS's Privacy Policy (GDPR).

For privacy reasons, **it is not recommended** that the student/user of the system use their own login credentials when licensing the system. In this case, this is done at the student/users own risk after reading this Privacy Policy.

The information is only related to the product serial number and purchaser, and therefore it is not possible for AbleCon to directly identify who the user of the aids is. Data is automatically deleted after 12 months and can be deleted on request at any time by sending an email to service@ablecenter.no.

AbleCon professionals and technical personnel are subject to confidentiality regarding access to the information mentioned above. The information is never disclosed to third parties except our data processors, unless it follows from mandatory law. AbleCon will notify the data subjects upon requesting the disclosure of information, unless it follows from mandatory law that it is not permitted to notify the data subjects.

The above information is stored on servers owned and operated by www.one.com and is located at <u>www.interxion.com</u> in Denmark/EU, unless otherwise stated.

Tripletex - accounting system In Norway, data is stored at <u>Basefarm</u>. Backup is stored at <u>Amazon Web Services in Ireland</u>.

OneDrive Microsoft Data locations for the European Union - Microsoft 365 Enterprise | Microsoft Docs

If you have objections with respect to the privacy or use of data that has not been processed satisfactorily.

PROCESSING OF PERSONAL DATA

Information is collected in order for Ablecon AS to perform the tasks and services we are required to perform in accordance with law, regulation and/or agreement. The processing of the data takes place within the framework of applicable law and regulations at all times.

Transparency and correction

You are entitled to access to the information registered. You can view your details in the www.ablesky.no.

You can also contact Ablecon AS by email, which answers your inquiry within 5 days within ordinary office hours.

Storage and deletion

Information that is no longer required for the purpose for which it is stored will be deleted automatically.

CONFIDENTIALITY AND SECURITY

We use a combination of physical, electronic and procedural safeguards to protect personal data.

Information on your account is password protected.

All data transmission that occurs over the Internet is encrypted. All transactions are processed over an industry-standard SSL/TLS connection with a minimum of 256-bit encryption.

Since no data transfers over the Internet are 100% secure, we cannot guarantee or support the security of any kind of information you send to us.

If Ablecon AS becomes aware of a breach in one of the security systems, we will notify you in writing by email or SMS so that you can take appropriate protective measures. By using our services or providing us with personal information, you agree that Ablecon AS will contact you electronically regarding security and privacy issues and administrative issues related to your use of the Service.

You are solely responsible for implementing appropriate security measures using our services. It includes, but is not limited to the use of secure passwords, encryption of passwords, secure retention of encryption keys, installation of security updates to 3rd party software and components etc.

Ablecon AS is not responsible for any information you choose to store using our services, and we cannot guarantee any consequences as a result of security breaches.

SENSITIVE PERSONAL DATA

None of Ablecon AS's services require sensitive and confidential personal data to be provided. Registration of such personal data in Ablecon AS's interface is not permitted and shall not be disclosed to Ablecon AS under any circumstances.

CHANGES TO THE PRIVACY POLICY

Customer agrees that Ablecon AS reserves the right to make changes to the Privacy Policy on an ongoing basis.

Ablecon AS is obliged to notify the Customer of material changes. Material changes include any circumstances that restrict the Customer's rights or that change the parties' obligations or rights in general. Notification of material changes should be sent by email to the email address specified as the contact address for the customer relationship.