

PERSONAL DATA COMPLIANCE DOCUMENT

Important notice

This document has been prepared to comply with the regulation (EU) 2016/79 of the European Parliament and of the Council of 27th of April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter "GDPR").

The GDPR states that we may lawfully process your personal data if you consent to this. We would therefore already at this initial page draw like to make sure that you understand the consequence of accepting this document. We would especially like to draw your attention to the following matters:

- By accepting this document, you consent to that we may process your personal data in accordance with the GDPR and as specified in this document;
- Your acceptance will be valid until you withdraw it and you can do that at any time;
- We may need to transfer your personal data to countries outside the EU and to international organizations which may not offer appropriate safeguards of your data. If this is the case your personal data may be at risk to be protected to a lesser degree than under the GDPR or to be unprotected. We therefore urge you to carefully read the relevant sections of the document regarding this matter.

We require you to give us the consent if you want to start using our services. If you later on withdraw your consent it will have the consequences specified in the document.

Read

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1. Why this document is important for you

- 1.1. This document is important for you because it:
 - (a) constitutes your consent to processing of data about you for specific purposes;
 - (b) provides you with information about the data we process and how we process it;
 - (c) provides you with information about certain of the rights you have under the GDPR.
- 1.2. The personal data are certain information about you which we process for the purpose of delivering our services. It can vary how sensitive you think this information is to you. The more sensitive you think it is the more careful you should read this document. You can see the information we process in the sheet titled “**The purpose of our processing and what data we process and for how long**”.

2. What kind of relationship you have with us

- 2.1. We act as data controller or data processor in relation to you and you can see in which capacity we act in the sheet titled “**Our identity, contact details and the capacity in which we act**”.
- 2.2. A data controller is the one determining the purposes and means of the data processing and the one you can invoke your rights as a data subject against (chapter III in the GDPR). A data processor is the one that the data controller may have delegated the data processing to and which in case of such delegation processes the data on behalf of the data controller.

3. What you should know about giving and withdrawing your consent

3.1. You give your consent to the data controller

- 3.1.1. You give your consent to the data controller.
- 3.1.2. This means that if we are acting as data controller you are giving your consent to us. If we are instead acting as data processor, you are giving your consent to the data controller and our role is only to obtain your consent on behalf of the data controller so that the data controller can lawfully delegate the processing of your data to us. You see in what capacity we act under the section titled “*What kind of relationship you have with us*”.

3.2. You consent to this processing

- 3.2.1. You consent to the processing specified in the sheet “**The purpose of our processing and what data we process and for how long**”.

3.3. You withdraw your consent this way

- 3.3.1. You may at any time withdraw your consent:
- 3.3.2. You can withdraw your consent by sending an e-mail using the e-mail address listed in the contact information stated under the section titled “*Who you should contact about the processing of your personal data*”.

- 3.3.3. The e-mail must clearly specify that you wish to withdraw your consent for the processing of your personal data. Any withdrawal of your consent will be deemed to be a notification to stop all processing of all your personal data.

3.4. The consequence of withdrawing your consent

- 3.4.1. Your withdrawal of your consent may have a negative consequence for you.
- 3.4.2. The reason is that it may become wholly or partially impossible or unreasonably difficult for us to continue to deliver our services. This is due to the fact that our services may be dependent on the processing of personal data or otherwise be organizationally or technically designed to process personal data. You can read about any consequences in the sheet titled "**The consequences of withdrawing your consent**".

4. What we would like you to know about our processing of your personal data

4.1. The identity and contact details on the data controller

- 4.1.1. The identity and contact details of the data controller is specified in the sheet with the title "**Identity and contact details on the data controller**".

4.2. The data passed on and, in some cases, transferred to non-EU countries and international organizations

- 4.2.1. We may only pass on your personal data in accordance with your consent.
- 4.2.2. You consent to that we may pass on your personal data in accordance with what is specified in the sheet "**Data we may pass on to third parties and if relevant transfer to non-EU countries and international organizations**".

5. What rights you have in relation to keeping control of your personal data

- 5.1. You have certain rights in relation to keeping control of your personal data.
- 5.2. A more detailed description of your rights can be found in the GDPR and we would especially like to make you aware of your right to:
- (a) Access (article 15)
 - (b) Rectification and erasure (article 16)
 - (c) Erasure (article 17)
 - (d) Restriction of processing (article 18)
 - (e) Data portability (article 20)
 - (f) Lodge a complaint with a supervisory authority (article 77)

6. Who you should contact about the processing of your personal data

- 6.1. You may contact us about any matter related to the processing of your personal data under this document.
- 6.2. This applies irrespective of whether we act as data controller or data processor. We will in case of acting as data processor make sure to pass on your communications to the data controller if we deem this necessary and we will coordinate any replies or actions with the data controller necessary to comply with the GDPR. You can contact us using the information in the sheet titled “**Our identity, contact details and the capacity in which we act**”.
- 6.3. You can also contact the data controller directly if you prefer this using the information stated in the sheet titled “**Identity and contact details on the data controller**”.

IDENTITY AND CONTACT DETAILS ON THE DATA CONTROLLER

The data controller is your employer.

If you are uncertain of the identity and contact details of your employer you can contact us using the information in the sheet titled "**Our identity, contact details and the capacity in which we act**".



OUR IDENTITY, CONTACT DETAILS AND THE CAPACITY IN WHICH WE ACT

We are:

Clearview Trade ApS

CVR-nr. 35638873

Sintrupvej 71

8220 Brabrand

Denmark

and you can contact us using the above address or:

E-mail: supportdk@clearviewtrade.com

and we act in the capacity as data processor on behalf of your employer.

THE PURPOSE OF OUR PROCESSING AND WHAT DATA WE PROCESS AND FOR HOW LONG

We offer a cloud service platform which makes various processes related to international trade more secure and easier to conduct.

EXAMPLES OF PLATFORM FUNCTIONALITY:

- Order transport of goods within and outside the EU
- Process export certificates and other export documents
- Deliver export statements to the relevant authority in connection with export to countries outside the EU
- Deliver EMCS documents to the relevant authority in connection with export to countries outside the EU

EXAMPLES OF CUSTOMIZED SERVICES

- Consultancy services regarding export regulations
- Development of customized solutions integrable with our platform

The above services require that we process contact information about persons involved in them and information about what actions each involved person have taken in relation to each service. The latter is necessary to comply with mandatory laws and to be able to document the chain of events in case of conflict in relation to a given service.

For the above purposes we more specifically process the following information about you for the following period:

What information we process about you	How we process the information	How long we process the information
YOUR CONTACT INFORMATION		
Name	We store the information and use it to identify and contact you.	Until shortly after your employer's subscription to our cloud service platform expires or shortly after your employer instructs us not to process it.
Work Place		
Direct e-mail adress (work e-mail)		
Direct phone number (work number)		
Direct mobile number (work number)		

What information we process about you	How we process the information	How long we process the information
<p>TRANSACTIONAL INFORMATION</p> <p>Date and time for your approval of export certificates</p>	<p>We store the information and use it to document your action.</p>	<p>Until shortly after your employer's subscription to our cloud service platform expires or shortly after your employer instructs us not to process it.</p>
<p>Date and time for your booking of a transport</p>	<p>We store the information and use it to document your action.</p>	<p>Until shortly after your employer's subscription to our cloud service platform expires or shortly after your employer instructs us not to process it.</p>
<p>Date and time for your request for an authority approval</p>	<p>We store the information and use it to document your action.</p>	<p>Until shortly after your employer's subscription to our cloud service platform expires or shortly after your employer instructs us not to process it.</p>
<p>General transaction log containing date and time for all actions you take on our cloud service platform</p>	<p>We store the information and use it to document all your actions.</p>	<p>Until shortly after your employer's subscription to our cloud service platform expires or shortly after your employer instructs us not to process it.</p>
<p>E-mails sent by you to us or by us to you</p>	<p>We store the information and use it to document our communication history with you.</p>	<p>5 (five) years from the date of sending or receiving it.</p>

In addition to the above there will also be other information which can be indirectly traced back to you.

If you for example book a transport we will be able to indirectly link you with all information about the transport via a transport ID or similar identification technique. When we stop processing personal data about you we will not delete all this indirect information but only the information linking you to it.

DATA WE MAY PASS ON TO THIRD PARTIES AND IF RELEVANT TRANSFER TO NON-EU COUNTRIES AND INTERNATIONAL ORGANIZATIONS

We may pass on all the personal data we process about you to any legal entities such as persons, companies or public authorities, which are involved in a service ordered via our cloud service platform or in one of our customized services, confer

EXAMPLES

- we pass on your contact information, the transport ID and all other information about a transport to the forwarder you have booked to carry out a transport
- we pass on your contact information, your request for the issuance of an export certificate and all other information required to obtain an issuance of the certificate to the the relevant public authority issuing the certificate
- we pass on your contact information, the export certificate approved by you and all other information about the goods dealt with in the certificate to the relevant public authorities in the receiving country.

the sheet titled **“The purpose of our processing and what data we process and for how long”**.

Any legal entity having received your personal data may also pass it on to other entities without having to obtain a separate consent for this from you. This means that your personal data may be passed on through a chain of recipients without obtaining a separate consent from you for each link in the chain.

Your information may as part of us or other legal entities passing on your personal data also be transferred to legal entities in non-EU countries and to international organizations even though they:

- are not comprised by an adequacy decision by the EU Commission approving the country or the organization for receiving personal data;
- do not otherwise provide appropriate safeguards of your personal data.

IMPORTANT

We would like to emphasize that the above means that your personal data could become at risk of being protected to a lesser degree than under the GDPR or to be unprotected.

THE CONSEQUENCES OF WITHDRAWING YOUR CONSENT

We will disable your user account on our cloud service platform if you withdraw your consent.
