

Consignor Privacy Policy

Version 1.1

In force from 01.11.2018

Thank you for contacting us or visiting one of our websites, www.consignor.com, www.consignor.no, www.consignor.se, www.consignor.dk, www.consignor.fi, www.consignor.co.uk, www.consignorportal.com and www.universe.consignor.com.

This policy explains what, how and why we collect information when you communicate with us or visit one of our websites. It also explains the specific ways we use and disclose that information. We fully respect all wishes for confidentiality of personal information that is disclosed online, and we are aware of the need for appropriate protection and management of any personal information that we receive. We never sell information about our users.

1. Definitions

The current policy is based on the following definitions:

Term	Definition
We, us, Consignor	All Consignor entities.
You, user	A person visiting any of our websites.
Subscriber	A person who has signed up to one of our newsletters or other services.
Personal data	Any information relating to an identified or identifiable natural person; an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, identification number, location data or an online identifier.
Processing	Any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organising, structuring, storing, adapting or alteration, retrieving, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Consent	Any freely given, specific, informed and unambiguous indication of your wishes by which you, by a statement or by a clear affirmative action, signify agreement to the processing of personal data relating to you.

In legal terms, we are the data controller, meaning the one that determines the purposes and means of the processing of personal data, whereas you are the data subject, meaning the person to whom the personal data relates.

We may engage other entities to process personal data on our behalf. In legal terms, such an entity is referred to as a data processor.

2. Scope

This Privacy Policy applies to our processing of any personal data that you provide when communicating with us or interacting with our websites and web shop.

3. Legal basis for processing of the personal data related to you

Our processing of your personal data is based on your consent, given separately before you provide the personal data. You may at any time withdraw your consent.

Please note that after the withdrawal of your consent given to us, we may no longer be able to provide our services to you.

4. Website owner (data controller) and contact information

This website is operated and owned by:

Consignor Group AS
Rådhusgata 4
0151 Oslo
Norway

Org. no.: 979 306 72

E-mail: DataProtectionOfficer@consignor.com

5. Data Protection Officer

We have appointed a data protection officer that you may contact if you have any questions or concerns regarding our processing of your personal data. You can reach the data protection officer by sending an e-mail to

DataProtectionOfficer@consignor.com.

6. Information collected

All Consignor's activities, particularly our web and online activities as well as our marketing campaigns are compliant with data protection and data security legislation. The following describes what information may be collected when communicating with us or visiting our websites and how this is handled.

We store personal data from two different sources on our websites: Personal data that you actively provide to us and personal data collected automatically through the use of cookies.

- A. **Personal Data you actively provide to us:** When you sign up for our newsletter(s), send us a message through our contact form, make a purchase on our web shop or communicate with us in any way, you are actively giving us personal data that we collect. That personal data may include your name, physical address, e-mail address, IP address and phone number. By giving us this personal data, you consent to this personal data being processed by us.

We use third party systems to collect and store personal data:

- **E-mail marketing system**

We use an external e-mail marketing system to collect subscribers for newsletter lists, which are used for different marketing and sales purposes. All personal data collected in the e-mail marketing system is collected via our websites and all subscriptions are subject to double opt-in.

- **Web shop**

When customers place orders in our web shop we collect personal data about the customers and their orders. The processing of personal data related to orders in the web shop is done for the purpose of carrying out the service deliveries to the Customer.

- **ERP-system**

To issue invoices for items purchased via our web shop we collect personal data (e.g. reference name) about the customer in our ERP system.

- **Delivery Management system**

To fulfil the delivery of items purchased via our web shop we collect personal data (e.g. delivery address) about the customer in our Delivery Management system.

- **Pop-up messages**

Consignor uses pop-up messages on our websites to collect subscribers for newsletter lists, which are used for different marketing purposes. All personal data collected in pop-up messages is collected via Consignor's websites and stored directly in the pop-up message system.

- **CRM system**

Consignor uses a CRM system to manage personal data on relations we have when communicating with either via e-mail, phone or in person. The CRM system is especially used in Sales related activities in Consignor.

- **Customer Service system**

Consignor uses a Customer Service (CS) System to manage personal data on relations with mainly existing customers and partners. We communicate either via e-mail, phone or in person and work ticket based in the CS system to gain control of the tasks (service requests and change requests) and incidents that the customer has raised.

- **Phone system**

Consignor uses a phone system that is integrated with our Customer Service system. When a customer is in contact with us on phone, we record the conversation for the purpose of training and education (a message about this is also played before the customer gets access to a Customer Service agent from Consignor). Consignor stores the recordings for 3 months' time, but all customers can ask to be deleted from any recordings immediately.

- B. **Data collected automatically:** When you use our website, we may collect personal data about your visit and web browsing. That personal data may include your IP address, operating system, browser ID, browsing activity and other data on how you interacted with our website or other websites. We collect this data using cookies. Cookies are small text files that are stored locally in the cache of your browser allowing us to recognise your browser and/or computer. The data is used for certain essential functionalities to make our sites work ("first party cookies"), for example to provide access to secure areas. First party cookies cannot be refused without impacting the function of our websites. In addition, cookies are used to create anonymous user profiles using Google Analytics ("third party cookies"). Third party cookies will not be merged with personal data profiles and for personal identification of visitors to our websites. User tracking data is used to review the performance of our websites and make improvements. We do not use third party cookies for advertising.

You have the right to decide whether to accept or reject cookies and you can do this through your browser controls. The means vary from browser to browser, so go to your browser's help menu for more information.

7. Use of personal data

We use the personal data we collect to promote our services to you and send informational and promotional content. You can stop receiving our promotional e-mails by following the unsubscribe instructions in every e-mail. In addition, we use the personal data to invoice customers who have made an order on our web shop.

You have the right at any time to receive and get access to the personal data stored regarding your person and to have incorrect data deleted or rectified. You can contact us at any time if you have questions about the handling of your personal data or if you wish to request the correction of personal data stored by us. See the Questions and Complaints guidance below.

8. Security

We take reasonable and appropriate measures to protect personal data from loss, misuse and unauthorised access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the personal data. Read more about Data Security in Consignor here: <http://www.consignor.com/data-security>.

In the event of a personal data breach, we will notify the supervisory authority without undue delay and no later than 72 hours having become aware of the breach, unless the breach is unlikely to cause a risk to the rights and freedoms of you or any of our users and subscribers. Moreover, if the breach is likely to cause a high risk to your rights and freedoms we will notify you without undue delay with at least:

- The name and contact details of the Data Protection Officer or other relevant contact point,
- A description of the likely consequences of the breach, and
- A description of the measures we have taken to address the breach.

9. Questions and complaints guidance

If you have comments, questions or concerns related to our information and/or handling of your personal data or want to access, update, change or delete any of your personal data, please feel free to visit our [Data Security Page](#) or contact us. Our contact details can be found in section 4.

10. Complaints to a supervisory authority

If you are of the opinion that we process or have processed your personal data unlawfully, you may lodge a complaint with the Norwegian Data Protection Supervisory Authority (Datatilsynet) or the supervisory authority of your country of nationality.

Contact details to the Norwegian Data Protection Supervisory Authority (Datatilsynet) can be found here: www.datatilsynet.no.

11. Changes

We may change and update this Privacy Policy from time to time. All updates and amendments are effective immediately upon notice, which we may give by any means, including but not limited to, by posting a revised version of this Privacy Policy on our website(s).