



CDP Technologies AS Privacy Policy

1. INTRODUCTION

CDP Technologies AS (CDP) is committed to protecting and respecting your privacy during your relationship with us.

This Privacy Policy explains how CDP processes information that can be used to directly or indirectly identify an individual (“Personal Data”) collected through use of its website, products and digital services: What Personal Data and Special Categories of Personal Data we collect from you and about you, how it will be used, and your individual rights. We will only Process your Data as permitted by applicable law.

2. DEFINITIONS THAT WILL HELP YOU UNDERSTAND THIS PRIVACY POLICY

Defined Term	Meaning
Data	Any Personal Data, and where relevant, any Special Categories of Personal Data.
Personal Data	Any information relating to an identified or identifiable natural person; an identifiable person is one who can either be directly identified from the data or indirectly identified, e.g. if that information can be connected with other information.
Data Subject	An identified or identifiable natural person whom the data is about.
Processing	Any handling of a Data Subject’s Personal Data including (but not limited to) the collection, storage, organising, disclosure, use and destruction of that Data.
Special Categories of Personal Data	Personal Data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership; Data concerning health or sex life and sexual orientation and; genetic data or biometric data.
GDPR	The General Data Protection Regulation, which regulates the processing by an individual, a company or an organisation of personal data relating to individuals in the EU/EEC, cf. the Personal Data Act section 1.



3. WHAT DATA DO WE PROCESS ABOUT YOU?

Type of Personal Data	How is Personal Data obtained?
IP address, geographical location, browser type and version, operating system, referral source, length of visit, page views and website navigation paths, as well as information about the timing, frequency and pattern of your service use. No personal data are gathered at this stage.	CDP's website
Your personal details and contact details – name, company, telephone number, and/or email address.	Your active input of personal data on our website for interest in CDP products or services or in connection with events, presentations etc.
Your personal details and contact details – name, company, telephone number, and/or email address.	Industry events and conferences
Your personal details and contact details – name, company, telephone number, and/or email address.	CDP seminars, conferences and training courses
Your personal details and contact details – name, company, telephone number, and/or email address.	Your contacting us via email or telephone
Your personal details and contact details – name, company, telephone number, and/or email address.	Regular correspondence and contact as part of our support channels
Your personal data in form of audiovisual data (photo, videorecordings etc.)	Participation on CDP events, visits on CDP premises
Your personal information regarding your interests and preferences about our products and services	Your active input of information in questionnaires and your feedback on web, e-mail, telephone
Your personal information regarding contract, product licenses and invoicing details	Conclusion of contract and/or issuing of licenses also for non-commercial users
Information regarding product download, product version and information regarding operating system and IP address	You downloading, upgrading product or services or using support services
Information regarding product crash	Your active consent for providing system information if a crash in the product was detected
Your personal details and contact details – name, company, telephone number, email address, and personal details provided via your CV and job application	Job applications

We do not Process Special Categories of your Personal Data.



4. HOW LONG DO WE PROCESS YOUR DATA?

Personal data that we process for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes. Where we determine that there is no longer any need or requirement to retain your Data, we will no longer Process that Data and your Data will be deleted in accordance with our Privacy Policy and applicable laws. If you want to receive more information about our data processing practices, we can be reached at the contact details set out in this Privacy Policy’s Section 9.

5. WHAT WE DO WITH THE INFORMATION WE GATHER

We use the information to provide CPD services and products to the customer. We also use the information to maintain relations and inform customers about CDP’s commercial interests and to inform and communicate information about CDP and its products and services. Information we gather in form of photos/videos from CDP events may also be used for marketing purposes, e.g. by uploading them to the CDP website.

The information is further used to:

- a) enable CDP to develop products and services
- b) enable CDP to provide support
- c) enable CDP to customize marketing
- d) analyze market trends
- e) improve our publications and services
- f) prevent and detect abuse of our services
- g) manage customer relationships
- h) enable CDP to invoice
- i) handle orders
- j) handle licenses
- k) provide you with information about relevant products and services

Processing is necessary for the legitimate interests of CDP, cf. GDPR article 6.1 (f). The legitimate interests are commercial activity and marketing (sending news letters), and informing about current changes in CDP. In our view, this does not represent a risk for your rights and freedoms. We have made individual assessments of the processing in relation to the different purposes.

6. WHO ARE RECIPIENTS (OR CATEGORIES OF RECIPIENTS) OF THE PERSONAL DATA?

Your Personal Data may be sent to or may be accessed by the following recipients:

Recipient or Category of Recipient	Location
CDP Technologies Estonia Ou	Estonia

In all these instances, we have appropriate contractual and security measures in place to ensure that personal data is protected. Please contact us if you need any further information, cf. section 9.



7. YOUR RIGHTS IN RELATION TO OUR PROCESSING

You have rights in relation to our Processing of your Data. These rights are summarised in Annex 1 to this Privacy Policy. You can exercise your rights at any time by contacting us at the contact details set out in Section 9 below.

8. COOKIES

We use cookies on our website.

A cookie is a small file which asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyse web traffic or lets you know when you visit a particular site.

Cookies are small text files held on your computer, allowing us to give you the best possible visit to our website. You can delete or block cookies, but this might lead to some parts of our website not working properly. If you continue without changing your settings, we'll assume that you are happy to receive cookies from this website.

Unless you adjust your browser settings to refuse cookies, we will see this as a consent and issue cookies when you interact with us. Processing is necessary for the legitimate interests of CDP, cf. GDPR article 6.1 (f). The legitimate interests are delivering, developing and improving CDP's services, and customize or modify our services. In our view, this does not represent a risk for your rights and freedoms.

Overview: Cookies in Use

Google Analytics and Google Tag manager is used on the web site. No other cookies is in use on this website.

9. CONTACT US

CDP is the Data Controller. If you have any questions regarding this Privacy Policy, data processing or to exercise your rights, please contact us at info@cdptech.com or +47 990 80 900.

If you believe that your data protection rights have been breached by CDP, please let us know. You also have the right to lodge a complaint with Datatilsynet, the supervisory authority for data protection issues in Norway: <https://www.datatilsynet.no> We appreciate the chance to deal with your concerns before you approach the supervisory authority, so please contact us in the first instance.

Last updated July 3rd 2019



Annex 1

The rights that are referred to in Section 8 of the Privacy Policy must be interpreted in accordance with GDPR, and are:

1. Right of access

You have the right to receive confirmation as to whether your Data is being Processed by us, as well as various other information relating to our use of your Data and copies of that information. You also have the right to request access to your Data which we are Processing.

2. Right to erasure

You have the right to request us to erase your Data.

We shall comply with your request without delay unless an exception to compliance applies, for example if the Data is required to establish, exercise or defend legal claims.

3. Right to object

You have the right to object to us Processing your Data. The relevant circumstances where you may invoke this right are where we are Processing your Data based on our legitimate interests. If you ask us to stop Processing your Data, we will stop Processing your Data unless we can demonstrate compelling grounds as to why the Processing should continue in accordance with data protection laws or, if the information is required to establish, exercise or defend legal claims.

4. Right to rectification

You have the right to make CDP correct any inaccurate personal data about you.

5. Right to restriction

You have the right to request that we restrict the Processing of your Data.

Where any exercise by you of your right to restriction, we will still hold the data but will not process it any further. However, we will process it the purpose of establishing, exercising or defending legal claims.

6. Right to Withdraw Consent

You have the right to withdraw your consent at any time. To do this, you should contact CDP in accordance with section 9 in this Privacy Policy.

7. Right to data portability

You have the right request that you receive copies of the relevant Data provided by you in structured, standard machine-readable format and, where technically feasible, to request that this information is transmitted directly to another controller.



CDP Technologies AS

Telemetry - Privacy Policy

INTRODUCTION

CDP Technologies AS and CDP Technologies Estonia Ou (collectively referred to as CDP) are committed to protecting and respecting your privacy during your relationship with us.

CDP has a need to understand how the product is used and collecting telemetry data can provide this understanding. The collected data will be used to improve the product and user experience.

The telemetry is an opt-in feature and data is collected anonymously.

The telemetry collection applies to CDP Studio, CDP Framework and installer.

OPT-IN AND ANONYMITY

The data collection is an opt-in service and must be actively selected before any data is collected. The data collection may be de-activated at any time from CDP Studio tool settings.

The data is collected anonymously and no data that can identify a user is stored, e.g. no IP address, e-mail, machine id, user id etc is stored. No personal information like file names, folder names, project names is collected.

DATA COLLECTION AND USAGE

The data collected is environment data and usage data. Environment data is information about the CDP Studio and Framework versions, operating system, toolchains. The usage data is information about the use of different features, usage frequency and times.

The data is used by CDP to understand how users use our products. Examples of use is: are useful functions found and used, are examples and tutorial used, do users get stuck, are new features used, do users succeed in using the tools, how much time do user use the product, which targets are used.

The understanding is used in defining the product roadmap, how features can be improved and communicated, adapt communication to what users are looking for and need, what kind of advice can be offered etc.

DATA RETENTION

The data collected is anonymous and while CDP would like to delete user specific data, it would be effectively impossible to identify and delete the data due to the rules on how the data is collected.