

PRIVACY POLICY

LEGAL

DEBBIE

Privacy Policy

Debbie

1. General information

- 1.1. This document describes how Intellitech Systems ApS, company registration number 4012 5949 having its registered address at Strandvejen 58, 1. floor, 2900 Hellerup, Denmark (“Intellitech” “we” or “us”) collects, and processes Personal Data (“**Privacy Policy**”). This Privacy Policy is applicable to all use of the Software-as-a-Service (SaaS), debt-collection platform “Debbie”.
- 1.2. All definitions in this Privacy Policy shall be interpreted in accordance with applicable data protection laws which refers to the General Data Protection Regulation (Regulation no. 2016/679) and the Directive on Privacy and Electronic Communications (Directive 2002/58/EC), as well as the national implementations and related national legislation.

2. Purposes of processing

- 2.1. We will process the personal data set out below in section 3 for the following purposes:
 - (a) to provide the agreed services, i.e. the debt collection platform “Debbie” in accordance with our License Agreement
 - (b) to administer your account, to enable and provide the Services and integration with third party services, and to provide, personalize and improve your experience with the Services, and to otherwise provide the Services according to the terms of use
 - (c) to send you alerts or messages by email or otherwise, including to provide you with marketing of our and our related parties’ products and services
 - (d) to inform you about updates of the Services or the terms of use
 - (e) to improve and develop the Services or new services and products and to analyse your use of the Services
 - (f) to ensure the technical functioning of the Services and to prevent use of the Services in breach of the terms of use

3. Data processed

- 3.1. We will process the following personal data in accordance with the instructions issued by you, the Data Controller. For the collection services facilitated by Debbie, the following personal data:

3.1.1. Personal Data on debtors:

- (a) Name
- (b) Address
- (c) Telephone number
- (d) Email
- (e) Social security number / company registration number
- (f) Invoice information, i.e. invoice no., dates and amounts due

This personal data is provided to us by you, the Data Controller. We then may store, enrich, structure, and/ present the data to the authorized users within your organization in accordance with our License Agreement.

3.1.2. Personal data on users/employees

- (a) Name
- (b) Email

We will store the personal data of relevant stakeholders in your organization for the purposes set out in section 2 above.

4. Legal basis

- 4.1. For the personal data listed in section 3.1.1 above, we are the data processor, and you are the data controller. As such, we only process personal data in accordance with the specific instructions as set out in the applicable Data Processing Addendum.
- 4.2. For the personal data listed in section 3.1.2 above is processed on the legal basis of legitimate interest, as we have a legitimate interest in fulfilling our obligations to you under the License Agreement.

5. Disclosure of personal data

- 5.1. To provide the agreed services, we need to disclose the personal data to the third-party providers listed below.
- 5.2. The following recipients are located inside the EU/EEA:

Navn	CVR-nummer	Adresse	Beskrivelse
Algolia SAS	FR-788680858 R.C.S. PARIS	55 Rue d'Amsterdam, 75008 Paris, Frankrig	Søgeindeksering
Mailgun Technologies, Inc. (EU-region)		Amazon Web Services, Frankfurt	Afsendelse af mails
Bech Distribution A/S	DK-12759908	Hedelykken 2-4, 2640 Hedehusene, Danmark	Afsendelse af fysiske breve
Vonage Limited		23 Main Street Holmdel, NJ 07733 USA	Afsendelse af SMS'er Standard Contractual Clauses
Google Ireland Ltd (Google Cloud Platform)		FV98+P7 Mons, Belgium	Cloud Service Provider

- 5.3. The following: Vonage Limited and Google Ireland Ltd (Google Cloud Platform) are located outside the EU/EEA and we are therefore applying Standard Contractual Clauses as the legal basis for the data transfers to this/these recipients. You can acquire further information regarding the transfer by contacting us at legal@debbie.dk.

6. Responding to legal requests and preventing harm

We may access, preserve and share your personal data in response to a legal request (like a search warrant, court order or a subpoena or the like), or when necessary to detect, prevent and address fraud and other illegal activity, to protect ourselves, you and other users, including as part of investigations.

7. Security

We warrant that all processing of personal data is safeguarded with sufficient technical and organizational security measures, taking into consideration the nature of the personal data, and the risks involved with the processing. The

specifics of our security measures are outlined in the applicable Data Protection Agreement.

8. Retention

We store your personal data as long as necessary to perform the agreed services (debt collection). After an agreement has been reached, or payment has been made by the debtor, we may store the personal data for an additional 5 years to comply with legal obligations.

9. Your rights

We respect all rights granted to data subjects as stipulated in the GDPR [chapter 3](#). For all data subject access requests, or questions regarding these rights, please refer to the contact information in section 10 below.

10. Contact information

- 10.1. To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact Debbie Legal Department at the following address: legal@debbie.com or at the postal address in section 1. In your letter/email please state your full name, contact information, and the specifics of your request. Note that you should sign the request to receive information of the processing of your personal data yourself.
- 10.2. If you have any complaints regarding our processing of your personal data, you may file a complaint to the competent data protection authority. You can find out more about the local data protection authorities under the following link http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm.

11. Change of Control

If there is a change of control in our business, we may transfer your information to the new owners for them to continue to provide the Services. The new owners shall continue to comply with the commitments we have made in this Privacy Policy.

12. Notice of changes to the privacy policy

If we make changes to this Privacy Policy, we will notify you by email. If your consent is required due to the changes, we will provide you additional prominent notice as appropriate under the circumstances and, ask for your consent in accordance with applicable law.