Privacy Policy for Electronic Communication

1. About this Privacy Policy

Questback is committed to data protection and your privacy. Protecting the privacy of individuals is extremely important to us. When it comes to processing personal data, we are aware of the importance of transparency for the individual whose data is being processed. This Privacy Policy sets out the way Questback processes personal data of individuals (hereafter "recipient(s)") who receive our electronic communication e.g. newsletters, emails etc. (hereafter "message(s)") and who use our Preference Center.

You are receiving all electronic messages on behalf of Questback AS, Bogstadveien 54, 0366 Oslo, Norway, phone: +47 21 02 70 70, mail: dataprotection@questback.com, unless stated otherwise in the message itself.

2. How we process personal information

We are processing your personal data such as your name, contact information, employer, area of interest, location and IP address to facilitate you with administrative messages, operational messages, and marketing messages.

Administrative messages contain information for the performance of a contract between us and our customers, their employees and representatives, or to initiate such a contract with prospects.

Operational messages are intended to assist our customers in using our products and services and to ensure the best possible user experience by providing support, consulting services, notification of updates, new releases, maintenance work and malfunctions.

Marketing messages contain information about Questback's products and services, demos, whitepapers, invitations to webinars, events, promotions, special offers etc.

We use personal data with the legitimate interest to communicate with existing and potential customers, ensure that customers get all required information and support in order to benefit from our products and services, provide relevant marketing and sales related information and communication to deepen customer relationship and increase customer satisfaction. We distribute marketing messages to prospects and other interested parties only, if they have submitted their explicit consent to receive such messages.

In addition, personal data deriving from our communication with you and your settings in the Preference Center users, will be used for our legitimate interest to create accurate and up-to-date records of existing and potential customers in our systems. To improve the quality of our database, we supplement existing data with personal data (i.e. employer, job title, contact information) we retrieve from other available lawful sources, e.g. online, social media platforms, address vendors, public registers etc.

We also use tracking technologies (e.g. cookies) to monitor the delivery, denial, reading and interaction with our messages for our legitimate interest to ensure proper transmission, improve the quality and usability of our messages, offer customized content and enhance recipient's benefit from our communication.

3. How we share personal information

We will not share your personal data with third parties unless stated otherwise in this Privacy Policy or required by statutory law or authorities.

We will share your personal data with members of the <u>Questback Group</u>. As far as personal data is accessed from or processed by Questback Inc. New York or Questback Inc. Texas, we have undertaken appropriate safeguards by concluding standard data protection clauses adopted by the EU Commission (Art. 46 (2) GDPR). For further questions on these safeguards, please contact us at dataprotection@questback.com.

Questback uses cloud-based services and applications to deliver marketing messages, to manage our customer relations and monitor email performance by tracking. Our suppliers for such services and applications process personal data only as instructed by Questback and for the purposes described in this Privacy Policy.

4. How long do we process your information

We will keep your personal data for no longer than is necessary for the purpose described in this Privacy Policy unless there is a legal basis for such processing or Questback is obligated to keep personal data due to statutory retention duties. If you chose to unsubscribe from our electronic communication at all, we will delete your personal data immediately upon cancelling your subscription, except for personal data we need to ensure that you will not receive unsolicited messages in the future.

5. Unsubscribe or adjust your subscription

You may unsubscribe from receiving electronic messages at any time <u>here</u>, or adjust frequency and topics in our Preference Center (Coming Soon).

6. Your choice

You may also be entitled to supplementary individual rights granted under data protection laws, such as the right to obtain confirmation if your personal data is processed, to obtain the rectification of inaccurate or completion of incomplete personal data, to obtain the erasure of personal data, to obtain restriction of data processing subject to certain preconditions, to receive the personal data concerning you, in a structured, commonly used and machine-readable format and the right to transmit those data to another controller. Certain legal restrictions may apply to the application or scope of such rights. If you wish to exercise a right to which you are entitled as data subject, please contact us by sending an email to dataprotection@questback.com.

7. Contact us

We take your privacy very seriously. If you think our use of personal data is unfair, misleading or inappropriate, we are open to your comment. As a natural person affected by data processing you may lodge a complaint at any competent supervisory authority for data protection. However, we strongly recommend to get in touch with us directly or our Data Protection Officer Arve Føyen (phone: +47 21 93 10 00, email: mailto:maf@foyentorkildsen.no).