**Famly Policy**

**Introduction**

Famly ApS (”We”; ”Us”; “Our”) is committed to protecting and respecting the data you share with us. This privacy policy explains how Famly processes information that can be used to directly or indirectly identify an individual (henceforth denoted ”Personal Data”) collected through the use of its website and interactions.

Famly ApS (Company Registration DK35413758) has its registered address at Købmagergade 19, 2. tv – 1150 Copenhagen K, Denmark and is data controller for the data that we collect concerning you and we ensure that your Personal Data is processed in accordance with the legislation.

For the purposes of this policy, Famly defines the term ”Respondent” as any individual who responds to Our demonstration, trial or sign-up -forms that are powered by Famly or any individual who is included as a contact within a User’s account and the term ”Visitor” as an individual that visits Our front-end website (for example famly.co).

If you wish to contact us regarding our processing of personal data, you can do that by email on:privacy@famly.co

**Processing of personal data**

Personal Data is every kind of information which in some way can be assigned to you.

To become our customer, it is necessary for us to collect the following Personal Data about you: Name, title, phone number and email. This information is collected on the basis of the following legal basis: Fulfillment of a contract.

As a supplier and business partner the following Personal Data is collected: Name, phone number and email. This information is collected on the basis of the following legal basis: Fulfillment of a contract.

If you do not want us to process this information, it may be problematic to maintain and meet any agreements that have been entered.

As a Respondent it is in some cases necessary for us, to collect the following Personal Data about you: Name, title, phone number and email. This information is collected on the basis of the following legal basis: Consent.

When you make use of our website as a Visitor we collect and process different kinds of kind of information. This happens for instance by ordinary access to content, if you sign up for our newsletter, take part in contests, studies, or webinars, register as a user or a subscriber, additional use of services or purchases through the website.

Normally we collect and process the following type of data: a unique ID and technical information about your computer, tablet or mobile phone, your IP-address, geographical location, as well as which pages you click (interests). To the extent that you give your consent to and enter Personal Data yourself we furthermore process: name, phone number, email and title. Typically, this would be in connection with login creation or a form sign up to a demo or trial of the Famly product.

This information is collected based on your consent.

If you apply for a job at Famly whether solicited or unsolicited and are an “Applicant” or “Candidate” we will usually collect Personal Data such as: Name, phone number, email, CV and potential a case or a test. This information is collected on the basis of the following legal basis: Consent.

**Respondents (Users of Forms)**

Respondents should be aware that by responding to both demo request, content download, webinar and newsletter forms on (but not restricted to) Our website, Google, Facebook, and LinkedIn advertisements, they could be disclosing information that can make them personally identifiable to Famly employees. Respondents should be aware that they alone are responsible for the content of their responses.

**Recruitment policy**

When receiving a job application or engaging with a potential Candidate and relevant appendices, the materiel will be read by the relevant manager with the purpose of answering and assessing the content in relation to a defined job.

Job applications and CV’s are shared internally with relevant persons in the recruitment process and will not be disclosed to anyone outside the company.

Job applications and CV’s are saved for up to 12 months - then it will automatically be deleted.

For unsolicited applications that are deemed relevant to save, the application and CV will be saved for a maximum of 12 months after which it will be deleted.

If the application and CV are saved for more than 12 months, special consent of the Candidate or Applicant is obtained.

**Safety**

We have taken the necessary technical and organizational measures to prevent that your data accidentally or illegally gets deleted, released, lost, impaired or gets to the knowledge of any unauthorized persons, abused or in any way processed against the legislation.

**Purpose**

Personal Data about Customers is collected for the following purposes:

* Processing your purchase and supply our services
* Administration of your relation with us

Personal Data about Respondents or Visitors is collected for the following purposes:

* Processing your request of content or supply our services
* Market our services to you
* Administration of your relation with us

Personal Data about Suppliers and business partners is collected for the following purposes:

* Processing purchases/services
* Administration of your relation with us

Personal Data about Applicants and Candidates is collected for the following purposes:

* Running the recruitment process and potentially offer you a job at Famly
* Administration of your relation with us

The data collected on our website is used to identify you as a user and show you the ads which will most likely be relevant to you, to register your purchases and payments, as well as to provide you with the services you have requested, for example to send you our newsletter. In addition to this we use your data to optimize our service and content.

**Data minimization**

We only collect, process and store the Personal Data necessary to fulfill our purpose. Furthermore, it may be determined by law, what type of data it is necessary to collect and store in connection with our business practices. The type and the extent of the Personal Data we process can be determined by the need to comply with a contract or any other legal obligation.

**Data is updated**

Since our service depends on the fact that your data is correct and up to date, we ask you to inform us about relevant changes in your personal data. You can make use of the contact information provided above to inform us about your changes, then we will make sure to update your data. If we notice that any data is incorrect, we will update the data and inform you about this.

**Storage period**

The data is stored in the time span which is allowed according to the legislation, and we will delete it when it is no longer necessary. The time span depends on the data’s character and the basis for the storage. Information about customers is deleted 5 years after the customer relationship ends. Information about suppliers is deleted when the warranty on purchased products has expired. Retention periods on cookies are listed in the cookies section below.

Famly will not retain data longer than necessary to fulfil the purposes for which it was collected or as required by applicable laws or regulations. For a Respondent’s data, Famly’s employees have control of the purpose of collecting that data, and the duration which the Personal Data may be kept.

When We have no ongoing legitimate business need to process your Personal Data, We will either delete or anonymize it, or, if this is not possible, then We will securely store your Personal Data and isolate it from any further processing until deletion is possible.

**Consent**

Your consent to receiving our newsletter and invites to webinars, contests or cookies is voluntary, and you can withdraw it by contacting us at any time. Use the contact information above, if you want further information.

**Passing on data**

We use a number of third parties for storage and processing of data, including IT suppliers. They only process data on our behalf and may not use it for their own purposes.

We only make use of data processors in EU or in safe third countries, including companies in countries which can protect your data properly. As data processors in countries outside of EU we make use of Google (for data collected through Cookies) and Facebook (data from our Facebook page).

Data concerning your website use, which ads you receive and click, your geographical location, gender and age segment et cetera, is passed on to third party to that extent that the data is known. You can find out the third parties we are dealing with in the section “Use of cookies” below. The data is used to focus the advertising.

**Famly’s data protection officer**

Famly has a “Data Protection Officer”, who is responsible for matters relating to privacy and data protection. This Data Protection Officer can be reached at the following address:

**Famly ApS
‍**Attn. Data Protection Officer
Købmagergade 19, 2.
1150 Copenhagen K
Denmark
privacy@famly.co

To comply with the UK General Data protection Regulation we have appointed a UK representative. If you wish to contact them, their details are as follows:

**Bird & Bird GDPR Representative Services UK**
12 New Fetter Lane
London EC4A 1JP
United Kingdom
UKrepresentative.Famly@twobirds.com
Main point of contact: Vincent Rezzouk-Hammachi

**Use of cookies**

When you visit our website, information about you, which is used to adjust and improve our content and increase the value of the ads shown, is collected. If you do not want information about you to be collected, you should delete your cookies and refrain from visiting the website. You can see a list of what information is collected, their purpose and what third parties can access them below.

Cookies are stored on your computer, mobile phone or similar with the purpose of recognizing it, remember settings, make statistics and focus the ads. Cookies cannot contain damaging content, such as virus.

If you delete or block cookies ads will maybe become less relevant to you and occur more often. Furthermore, you risk that the website does not work optimally and that some content cannot be accessed.

**What is a cookie?**

A cookie is a small text file which is stored on your computer to keep track of what happens during your visit and to recognize the computer. A cookie only contains text, is not a program and cannot contain virus.

**How to reject or delete cookies**

You can always reject the use of cookies on your computer by changing the settings in your web browser. Where you find the settings depends on your browser. Note, that if you reject cookies many functions and services may become unavailable, because these functions and services are based on the website remembering your choices.

Cookies which you have previously accepted can easily be deleted. If you use a PC/computer with a recent web browser you can delete cookies by pressing CTRL + SHIFT+ Delete. If this does not work or if you use a MAC, you start by finding out what browser you use and then click on the following link:

Microsoft Internet Explorer
Google Chrome
Safari
Firefox

Remember: If you use more than one browser you need to delete cookies in all of them.

**Third party cookies**

The website contains cookies from third parties, to varying extent this may include:

Necessary cookies:

Necessary cookies are sometimes called “strictly necessary” as, without them, We cannot provide many services that you need on the Website. For example ‘Preferences Cookies’ allow Us to remember choices you make on Our websites (such as your preferred language or the region you are in).

Statistics cookies:

These cookies track information about visits to the Website so that We can make improvements and report Our performance. For example, some cookies analyse visitor and user behaviour in order to provide more relevant content or suggest certain activities. They collect information about how visitors use the Website, which site the user came from, the number of each user’s visits and how long a user stays on the Website. We might also use statistics cookies to test new ads, pages, or features to see how users react to them.

For the avoidance of doubt, these cookies are not used on the main Famly App, but just on the Famly Corporate website.

**List of Cookies used on the Website by Famly:**

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| Website name | Cookie Provider | Cookie Purpose | Duration | Cookie Type |
| --- | --- | --- | --- | --- |
| famly.co | Cookiebot | Cookie handling | 1 year | Necessary |
| famly.co | Hubspot | Form handling & session IDs | 179 days | Necessary |
| famly.co | Google/YouTube | Cookie handling | 2 years | Necessary |
| famly.co | Intercom Cookie | Real-time support chat | 7 days | Necessary |
| famly.co | Google | Website behavior | 38 months | Statistics |
| famly.co | Microsoft Clarity | Website behavior | 1 year | Statistics |
| famly.co | Facebook Ads Cookie | Advertising, Retargeting | 180 days | Marketing |
| famly.co | Linkedin Ads Cookie | Advertising | Session | Marketing |
| famly.co | Twitter Ads Cookie | Advertising | 2 years | Marketing |
| famly.co | Microsoft | Advertising | 2 years | Marketing |
| famly.co | Instagram | Advertising, Retargeting | Session | Marketing |
| famly.co | Soundcloud | Advertising, Statistics | Persistent | Marketing |
| famly.co | YouTube | Advertising, Statistics | Persistent | Marketing |

**Your rights**

If you change your mind and want to update your cookie settings, you can do so by adjusting them [here](https://www.famly.co/terms/privacy-policy).

At any time, you have the right to be informed of what Personal Data we process concerning you, from where we have collected it and what we use it for. You may also be informed about how long we store your Personal Data, and who receives Personal Data concerning you, to that extent that we pass on data in Denmark and to foreign countries.

If you request, we can inform you about what Personal Data we process concerning you. The access might be limited with respect to privacy protection, business secrets and immaterial rights.

You can make use of your rights by contacting us. You can find our contact information at the top.

If you think that the Personal Data we process concerning you is imprecise, you have the right to have it corrected. In that case you must contact us and inform us what the imprecision is and how it can be corrected.

In some cases, we will have an obligation to delete your Personal Data. This is for instance the case if you withdraw your consent. If you think that your Personal Data is no longer necessary to the purpose we collected it for, you can request it to be deleted. You can also contact us if you believe that your Personal Data is processed in contravention of the law or other legal obligations.

You can also lodge a complaint with a supervisory authority.

When you contact us with a request to have your Personal Data corrected or deleted, we examine whether the requirements are fulfilled, and if that is the case, we make the changes or delete as soon as possible.

You have the right to object to the processing of your Personal Data. You can also object to the processing of our passing of your data for marketing purposes. You can make use of the contact information at the top to object. If your objection is justified, we make sure to stop the processing of your Personal Data.

You can make use of data portability if you want your Personal Data transferred to another data controller or data processor.

On our own initiative, we delete your Personal Data, when it is no longer needed for the purpose, we collected it for.

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Updated and implemented Autumn Term 2023 – reviewed regularly and risk assessment monitored and evaluated