



## Privacy Policy

Little Bird ApS (“we”, “us”, “our”) respects your privacy and is committed to protect your personal data. This Privacy Notice (“Notice”) will inform about how we process your personal data.

You acknowledge and agree that your personal data may be processed in accordance with this Notice. Processing your personal data is, amongst others, necessary in order for us to be able to communicate with you and send you special offers, promotions and/or newsletters (subject to your explicit consent).

### 1. About us

1.1. We are the data controller in respect of any personal data that we process about you pursuant to applicable data protection law, including the Danish Data Protection Act and Regulation (EU) 2016/679 of 27 April 2016 (GDPR).

1.2. If you have any comments or enquires related to this Notice, please do not hesitate to contact us at:

Little Bird ApS  
Ørestad blvd. 73  
2300 Copenhagen S  
[support@libratone.com](mailto:support@libratone.com)

### 2. Personal data collection

2.1. We collect and process any personal information that you provide to us directly, including when you communicate with us or when you sign up for our newsletters.

2.2. In addition, we automatically collect certain information via cookies when you browse our webpage, including for example your IP-address and information about the pages visited. You can read more about our use of cookies by reading our Cookie Policy available [here](#).

### 3. How we use your personal data

3.1. We may process the personal data collected for the below purposes:

- a.) to communicate electronically with you about special offers, promotions, events and news about our products and services via email but always subject to your explicit consent;
- b.) to generate and analyse statistics on the basis of information collected via cookies when you browse our webpage for the purpose of improving our webpage and better understand your preferences;
- c.) to personalise our marketing, including our newsletters and online banners, on the basis of information provided when you register products with us and information collected via cookies about your browsing behaviour and preferences for the purpose of making sure that any advertising, offers, promotions, tips, updates or news stories are more relevant to you; and
- d.) to provide you with customer service and to communicate with you in respect of for example product queries and support requests.

### 4. Legal basis for processing your personal data

4.1. We will process your personal data because it is necessary for the purpose of furthering our legitimate interests in respect of the purposes listed in items b-d) above, cf. article 6(1)(f) of the GDPR.



4.2. We will also process your personal data on the basis of any consents provided by you, for example to communicate with you about special offers, promotions, events and news about our products and services as noted in item a) above, article 6(1)(a) of the GDPR. You can at any time withdraw any such consent provided by clicking an unsubscribe link in the communication received or by contacting us using the contact details specified in section 1.2 above.

**5. Protection and storage of your personal data**

5.1. We take your privacy seriously and will accordingly ensure that appropriate technical and organisational safeguards are in place at all times in order to protect your personal data against unauthorised or unlawful processing and against accidental loss, damage, destruction, alteration or disclosure.

5.2. The personal data we collect about you will only be stored for as long as stated below:

Purpose of collection	Retention period
To communicate with you about special offers, promotions, events and news about our products and services.	Until you withdraw your consent or after 12 months in case no marketing has been sent on the basis of the consent provided in the preceding 12 months.
To generate statistics and analyses about how you use our webpage.	12 months after collection if there are no new engagements with www.Libratone.com. Revisits to our webpage will trigger a new 12 months period of data storage.
To personalise our marketing.	12 months after collection if there are no new engagements with www.Libratone.com. Revisits to our webpage will trigger a new 12 months period of data storage.
To provide you with customer service and to communicate with you in respect of for example product queries and support requests.	Up to 3 months after your enquiry has been handled or until there is no reason to believe that further correspondence will be needed.

**6. Third party recipients of your personal data**

6.1. We may if relevant share your personal data with the below categories of third parties:

- a) service providers assisting with our business activities, including hosting providers, providers of IT support and web analytics service;
- b) our advisors;
- c) our affiliates; and
- d) other third parties i) with your consent, ii) if they are involved in a merger, de-merger or a sale which involves all or part of our business or assets, or iii) if otherwise compatible with the purpose of which the personal data were initially collected.
- e) Third parties receiving personal data are: Zendesk, Logate, QuickPay, Facebook, Google.

6.2. You can rest assured that any such transfer of your personal data will take place in accordance with applicable data protection legislation and subject to appropriate security measures.



**7. Transfer of your personal data outside the European Economic Area (EEA)**

7.1. Some of the third parties to whom we may transfer your personal data may be located outside of the EEA. If we transfer any of your personal data to countries outside of the EEA which do not provide an adequate level of protection according to applicable data protection legislation we will always ensure that appropriate safeguards to protect your data are in place. In this respect, we will only transfer your personal data if the third party:

- a) is established in a country which, according to a decision of the European Commission, offers an adequate level of data protection;
- b) has entered into a contract with us in accordance with the European Commission’s model contracts for the transfer of personal data to third countries; or
- c) has been certified under the 'EU-US Privacy Shield Framework' (only relevant for recipients in the U.S.).

7.2. We may transfer your personal data to the following third parties outside EEA:

Recipient	Country	Safeguards
Zendesk	USA	Data Processing agreement compliant with European Commission’s model contact

7.3. If you would like more information about our transfer of personal data to countries outside of the EEA, please contact us using the contact details specified in section 1.2 above. Do not hesitate to contact us if you would like more information about the security measures in place to protect your data, or copies of relevant documents, including the European Commission’s model contacts.

**8. Your rights**

8.1. Subject to certain conditions set out in data protection legislation, you have the following rights in respect of your personal data:

- a) the right to insight to the personal data, which we store and process about you, as well as a number of additional information regarding the processing;
- b) the right to obtain a copy of the personal data we have collected about you, in a structured, commonly used and machine-readable format, and to transmit those data to another controller;
- c) the right to update or amend the personal data we have collected about you if it is inaccurate or incomplete, or in certain cases, erased prior to the end of the retention period listed in section 5.2;
- d) the right to object to the processing of the personal data we have collected about you, including in respect of any data processed for direct marketing purposes; and
- e) in certain cases, you have the right to restrict the processing of the personal data we have collected about you.

8.2. Where our processing of your personal data has been restricted, such personal data shall for as long as restricted and with the exception of storage, only be processed with your consent or for the establishment, exercise or defence of legal claims or for the protection of the rights of another natural or legal person or for reasons of important public interest.

8.3. If you have any questions regarding the processing of your personal data or wish to carry out any of your rights, please contact us by using the contact information in section 1.2 above.



- 8.4. You have the right to lodge a complaint with the Danish Data Protection Agency ([www.datatilsynet.dk](http://www.datatilsynet.dk)).

**9. Changes to this notice**

Any changes to this Notice will be published on our webpage and in addition any material changes hereto will be notified to you directly by e-mail if we have your contact details.

Last updated 3<sup>rd</sup> July 2020