

PRIVACY POLICY FOR LUMINO.IO

1. GENERAL INFORMATION

- 1.1 Lumino.io ApS, company registration number 33035012 having its registered address at Njalsgade 76, 4th floor, DK-2300 Copenhagen S (“Lumino”). This document contains a policy statement regarding Lumino.io collection, use and processing of Personal Data (“**Privacy Policy**”). The Privacy Policy is applicable when Lumino process Personal Data about its customer to provide the Services.
- 1.2 All definitions in this Privacy Policy shall be interpreted in accordance with applicable data protection laws which refers to the Danish Data Protection Act (no. 502 of 23 May 2018) and 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.
- 1.3 Lumino process Personal Data on identifiable – but unidentified – persons by way of username and picture from posts on Instagram. The Personal Data is used with the purpose of identifying trends and consumer behaviour and as a part of Lumino’s advice to its customers. In exceptional usernames and pictures from specific posts from Instagram are used in the end product for the customer (typically in the form of a physical written report and Powerpoint presentations) with the aim of guiding the customer in their strategic decisions. Lumino’s end products are thus not compiled with the purpose of publication or in a way where Lumino’s customers publish or in another manner redistribute Personal Data contained in the end product. Lumino does not collect, and are not obliged to collect further Personal Data on identifiable persons behind the relevant Instagram profiles. Personal Data is stored as long as there is a customer relationship.

2. PROCESSED DATA

- 2.1 The following Personal Data may be Processed when we register users, receive and send emails and issue invoices:
 - (a) name;
 - (b) email address;
 - (c) telephone number;
 - (d) username;
 - (e) text string;
 - (f) pictures of data subjects;

2.2 The Processing of the Personal Data above is necessary to enter into the service and consultancy agreements with us and is necessary to maintain the contractual relationship between you and us.

3. PURPOSES OF PROCESSING

3.1 We will process the Personal Data set out above for the following purposes:

- (a) to administrate 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;
- (b) to send you alerts or messages by email;
- (c) to inform you about updates of the Services or the terms of use;
- (d) to improve and develop the Services or new services and products and to analyse your use of the Services;
- (e) to ensure the technical functionality of the Services and to prevent use of the Services in breach of the terms of use;
- (f) to enforce the terms of use, including protecting our rights, property and safety and also the rights, property and safety of third parties if necessary; and
- (g) to comply with mandatory legislation.

4. LEGAL GROUND

4.1 By entering into a contract with Lumino you accept our processing of your personal data in order for us to be able to fulfil our contractual obligations with you.

4.2 We are processing your personal data to be able to fulfil our legal requirements according to applicable tax legislation and the Bookkeeping Act as we may be required to provide information to the authorities about your VAT number and invoiced amounts.

4.3 The processing of your personal data is conducted on the basis of the legitimate interest of the Lumino. We have a legitimate interest for the processing as we log data when you use our Services to be able to maintain sufficient IT-security, and to protect the Website and the Services from cyber threats. We also log data for the purposes of maintaining and improvement of our Website and Services.

5. DISCLOSURE OF PERSONAL DATA

5.1 We may share and disclose your personal data to be able to communicate with e.g. payment service providers.

5.2 When using the Services, you may be directed to other websites where the personal data collected is not under our control. The privacy policy of the other website will govern the personal data obtained from you on that website.

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. COOKIES, PIXELS AND OTHER SYSTEM TECHNOLOGIES

We collect information by using technology such as cookies, pixels and tags (on your browser or device). For information about how we use this type of technologies, please see our cookie policy.

8. RETENTION

We store your personal data as long as there is a customer relationship.

9. CHILDREN

The Services are not directed to persons under the age of thirteen (13). If you are a parent or guardian of a person under the age of 13 and you become aware of that the child has provided personal data to us without your consent, please contact sst@lumino.io to exercise your access, rectification, erasure, limiting of processing and objection rights.

10. YOUR RIGHTS

- 10.1 You have an absolute right to object to the processing of your personal data for direct marketing. You also have the right to recall your prior given consent. The withdrawal of your consent does not affect the lawfulness of the processing based on the consent before its withdrawal, and we may continue processing your personal data based on other legal grounds, except for direct marketing.
- 10.2 You have the right to request access and further information concerning the processing of your personal data, or request that we correct, rectify, complete, erase or restrict the processing of your personal data. You have the right to obtain a copy of the personal data that we process relating to you free of charge once (1) every calendar year. For any additional copies requested by you, we may charge a reasonable fee based on administrative costs.
- 10.3 If the processing is based on the legal grounds consent or fulfilment of contract you have the right to data portability. Data portability means that you can receive the personal data that you have provided to us, in a structured, commonly used and machine-readable format, and have the right to transfer such data to another data controllers.

11. CONTACT INFORMATION

- 11.1 To exercise your rights, or if you have any questions regarding our processing of your personal data, please contact us at the following address: sst@lumino.io or Lumino.io, Njalsgade 76, 4thfloor DK 2300 Copenhagen S. In your letter/email please state your full name, username and e-mail. Note that you should sign the request to receive information of the processing of your personal data yourself.
- 11.2 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.

12. NOTICE OF CHANGES TO THE PRIVACY POLICY

If we make changes to this Privacy Policy we will notify you at our homepage, lumino.io. 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.
