

# Privacy Policy

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## Who we are

We are Visual Elements AS, the company behind everviz, available from [www.everviz.com](http://www.everviz.com). Our address is Lars Hilles gate 30, co/VIS Innovasjon, 5008 Bergen, Norway.

You can contact us by postal mail at the above address, or by email at [privacy@everviz.com](mailto:privacy@everviz.com).

In collecting information about you, we are acting as a data controller and we are required to provide you with information about why and how we collect and use your data, and about the rights you have over your data.

We are not required to have a Data Protection Officer. Any inquiries about our use of your personal data should be addressed to the contact details above.

## Introduction

We are committed to protecting your privacy. Any and all information collected is safeguarded according to the applicable legislation concerning personal data and is compliant with the European Union's General Data Protection Regulation (GDPR).

This privacy policy outlines the personal data we collect when you use and interact with our website and services.

## How we collect your information

In the course of providing content, and services to our visitors and customers, we collect or receive information about you in different ways.

You provide some data directly, and some data we get by collecting data about your interactions, usages, and experiences with our website and services. When collecting your data we will give you the chance to choose what information to provide for e.g. enabling us to market and promote products or services.

We collect and process personal data about you only where we have a legal basis for doing so under applicable EU laws, even if you are located outside the EEA.

## **Why we collect your information**

We collect information in order to be able to understand our customers, analyze and improve our website and services accordingly. In some cases, we may require certain information in order to provide certain products and services and to ensure our services and offerings are performing optimally and to protect our, and your legal rights and interests.

## **Information storage and security**

We will make every commercially viable measure to secure your data according to GDPR guidelines. We rely on third-party partners for some of the features and functionality to collect data about you and your use of our website and services. We have Data Processing Agreements (DPA) with all third-party data processors that commits them to provide an appropriate level of safeguards for your personal data, which includes compliance with GDPR.

Most of our data is collected and processed within the EEA. For processing that is taking place outside EEA, we have in addition provided appropriate safeguards by ensuring that our partners are either committed to Privacy Shield or that they have accepted the EU standard contractual clauses.

Below you will find more information about how we collect and process information, including how we use third-party partners in connection with our services.

## **When you use our website**

This section details the information we collect from you when you use our website, [www.everviz.com](http://www.everviz.com) and all associated subdomains, to view the content we make available. The data we collect is necessary for some functionality to work properly. Some data are collected to obtain insights from our website and marketing efforts.

Our legal basis for collecting the information described in this section is based on legitimate interest, in reference to Article 6-1(f) of the GDPR, or consent in reference to Article 6-1(a) of the GDPR.

The below mechanisms are used to collect information about you when you visit our website.

## **Cookies**

Cookies are small pieces of text sent by a website and stored on your computer by your web browser. A cookie file is stored in your web browser and allows the service or a third-party to recognize you and make your next visit easier and the service more useful to you.

Please refer to our [Cookie policy](#) for detailed information on which cookies we set when visiting our website and using our services, including what purpose each serves.

We use website analytics services called Google Analytics, Google Ads, and Google Tag Manager to record usage and performance data of our website and web-services. We use HubSpot and Facebook to gather certain website data related to campaigns, to customise content and advertising and to analyse traffic to the site.

We aggregate anonymized data based on e.g. the date you visit the site, how often you come to this site, what pages you visit when you do so, and what other sites you used prior to coming to this site, observing trends, visitor numbers and behavior. We have followed all the best practices provided by Google to avoid sending personal data like e.g. IP addresses or your detailed location. We have ensured that the data we collect through Google Analytics is anonymized in such a manner that it can not be used to re-identify you.

We use Hotjar in order to better understand our users' needs and to optimize this service and experience. Hotjar is a technology service that helps us better understand our users' experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices. This includes a device's IP address (processed during your session and stored in a de-identified form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), and the preferred language used to display our website. Hotjar stores this information on our behalf in a pseudonymized user profile. Hotjar is contractually forbidden to sell any of the data collected on our behalf. For further details, please see the 'about Hotjar' section of [Hotjar's support site](#).

## **Web beacons**

Pages on our site and emails we send to our users may contain web beacons. Web beacons (also referred to as clear gifs, pixel tags, and single-pixel gifs) are small electronic file references that are embedded onto a web page or an email to analyze traffic, for example, whether a user has successfully opened an email, visited a page or completed a purchase.

In contrast to cookies, which are stored on a user's computer hard drive, web beacons are rendered invisibly on web pages when you open a page.

## **UTM codes**

We may also make use of UTM codes. These are strings that are appended to a URL (the "Uniform Resource Locator," which is typically the HTTP or HTTPS address entered to go to a web page) when a user moves from one web page or website to another, where the string can

represent information about browsing, such as which promotion, page or publisher sent the user to the receiving website.

UTM codes are used to enhance our web analytics solutions to understand, for example, if the visitor's journey on our site started with a newsletter or ad campaign. Any analytics gathered on the basis of UTM codes are, and will remain, anonymous and analyzed in aggregate form.

## **Why do we collect this information?**

Some tracking mechanisms are considered necessary and is required in order to provide certain functionality like navigation and search. Other tracking mechanisms are essential for us in order to understand how our visitors find and use our site. We also monitor our website performance, such as what pages our visitors navigate to, what FAQ's you read and other data that lets us understand how to improve our service and offerings, as well as measuring marketing efforts and user experience to ensure intended and proper functionality.

If you do not want us to track your website interactions even though it is anonymously, you may revise your cookie preferences on our website. We will not deny you access to our site or services. Should you choose to decline the use of such tracking mechanisms, there may be cases where the user experience is not optimal.

## **What do we do with your information?**

Besides the functionality necessary for our website and services to function, we may use portions or aggregated numbers for internal marketing presentations or use Google Data Studio for analytics.

We do not share or sell any information collected, even when anonymized.

Google provides some additional [privacy options for Google Analytics cookies](#).

## **How long do we keep your information?**

The information we collect will be anonymised and kept for a maximum of 38 months. Google provides some additional [privacy terms](#).

## **Additional rights as a data subject**

In collecting this information, we are acting as a data controller and you have additional rights with regards to the data we store and process, which is outlined in the section below called '[Your rights as a data subject](#)'.

## **When you submit an inquiry via our website, service or social media**

Our legal basis for processing and collecting your personal data when you contact us via our website is based on contractual obligations in reference to Article 6-1(b) of the GDPR. We will ask for a minimum set of information in order to reply to a technical or sales support question, or other inquiries.

Our legal basis for collecting information on you when you contact us via Social Media is based on our legitimate interest to provide you with the most accurate response in a timely manner in reference to Article 6-1(f) of the GDPR.

When you submit an inquiry via our website, we may ask you for your company name, email address and a brief description of your inquiry. We will always ask for the minimum of information needed to best be able to serve you based on your type of enquiry.

### **Why do we collect this information?**

We will use your information to respond to your inquiry and hopefully to provide you with the information you need, including providing you with any requested information about our products and services. We do this in order to take steps at your request prior to entering into a contract e.g. as part of pre-sales activity.

We may also email you several times after your inquiry in order to follow up on your interest and ensure that we have answered to your satisfaction. We will do this based on our legitimate interest to provide support or in providing accurate information prior to a sale or otherwise assist you in a request for information.

### **What do we do with your information?**

When you ask us a question in Social Media, like Facebook, Twitter, Instagram or LinkedIn, we will reply to your inquiry directly on that platform. No data will be sent automatically to other systems, although we encourage you to contact us via email on [support@everviz.com](mailto:support@everviz.com). We will also have access to aggregate insights to visitor activity on our social media accounts, as well as any individual public activity, such as liking, posting or commenting on our accounts. For all interactions on our social media accounts, we hold a shared data controller role of your data along with the social media platform. This means that all information posted on our social media accounts will also be available to that social media company. In order to learn more about such companies use of personal data, please visit the respective social media company's privacy notice.

Regardless of how you contacted us, we may share your question/problem in our internal email provided by Google or chat platform provided by Slack for internal support in providing you with a solution but will exclude any personal data.

Your sales-related inquiry is stored and processed by our CRM-system, HubSpot, and also as an email that is hosted by Google.

Technical Support inquiries are stored and processed by HubSpot and also as an email that is hosted by Google.

Our support inquiries are handled by us or a third party consultancy firm. Our partners will have access to the minimum of information needed to provide support.

If you post a comment on our site, we won't use your email address except when we send you update-notices about the specific entry you commented or to initiate a private one-to-one email conversation with you about your post.

Your name, email, and company name are also transmitted to HubSpot for the sole purpose of sending you information that we think will be of interest to you with respect to your inquiry.

## **How long do we keep your information?**

Inquiries you make that are not of a financial or legal nature (e.g. purchasing a product or service, which will be handled according to Subsection below called 'When you use our Service') will be removed from our records if you are inactive for more than 2 years, unless you explicitly consent to us storing your information for the purposes of keeping you updated on our products and services (in such a case, see below ['when you sign up to receive Newsletters'](#) on how we handle your data).

## **Additional rights as a data subject**

In collecting this information, we are acting as a data controller and you have additional rights with regards to the data we store and process, which is outlined in the section below called '[Your rights as a data subject](#)'.

## **When you submit a survey, participate in a competition or apply for a job**

This section tells you about the information we collect from you when you submit a survey, participate in a competition or apply for a job via our website. Our legal basis for processing and collecting your personal data is based on consent Article 6-1(a) of the GDPR.

Along with your contribution, we may ask you for your email address, and optionally other information about your interests, preferences, opinion, etc. as relevant to the particular submission.

## **Why do we collect this information?**

Depending on your inquiry we will e.g. need personal data to contact you to evaluate if you are a candidate for a job, and other relevant information pertaining to the nature of the inquiry. We will not collect or accept this information without your explicit consent.

## **What do we do with your information?**

We will store and process the information you share with us in HubSpot or Human Resourcing tool depending on the type of request. We may in some cases use Google forms when conducting Surveys. Your reply will then be processed by Google. Please refer to Google's [Privacy Policy](#) for information.

We may publish your submission to our website, in the event that was the purpose of the submission. Further details will be provided upon initial contact. We will use your email address to provide the information you need related to your inquiry.

We may ask for your consent to retain your information in our systems in order to send you further information that we think may be of interest to you. We will only send you updates and information for as long as you continue to consent. You may unsubscribe to such automated contact at any time by clicking the unsubscribe link at the bottom of any email newsletter you receive.

## **How long do we keep your information for?**

Your information is kept for as long as you continue to consent, but we cease to send you updates and will remove your data from our records if you are inactive for more than 2 years. Inactive, in this respect, means that you have not read any of the newsletters we have sent you.

You may opt-out such updates at any time, which will result in the prompt deletion of any non-legal or financial information we have about you.

When you apply for a job, your information will be removed from our database once the position is filled, or until – if applicable – you are no longer considered for the position. The information will not be stored for longer than 3 months after your submission.

## **Additional rights as a data subject**

In collecting this information, we are acting as a data controller and you have additional rights with regards to the data we store and process, which is outlined in the section below called '[Your rights as a data subject](#)'.

## **When you use our Service**

This section outlines the information we collect from you when you sign up for our service. Our legal basis for processing and collecting your personal data is based on contractual obligations in reference to Article 6-1(b) of the GDPR.

When you sign up to use everviz, we may ask you for your name, payment info, billing address, email address, company name, and we collect your IP address.

Additionally, we might in some cases also ask for additional information like intended usage, and the company institution name.

Agreements and other relevant information related to the subscription will be stored in HubSpot, Recurly and in Google Teams Drive account.

We collect aggregated data about how users use our service. everviz uses cookies to track how you use the service, in order to monitor and improve our products and services. For more information on which cookies are required when using everviz, please refer to our [Cookie policy](#).

## **Why do we collect this information?**

This information is required in order to process your payment, provide access to everviz, and to comply with applicable tax/revenue laws. We will use your email address to send you a receipt after purchase and contact you regarding your purchase or otherwise ask for information necessary to fulfill our contract with you.

In order to use everviz, you need to register through an OAuth provider or through an email/password combination. As such, access to your account may be authenticated by signups/logins with email/password or by signing in using your Google account. We will need it to register you as a user of our service, and to authenticate you as the owner of the data stored within your account. By using our service, you must allow that user credentials such as your email and an authentication token are sent to us. We will use this information to verify future logins. We may also use your email to send you product updates, or otherwise communicate with you to ensure you get the most out of using our service. Such communication is separate from any other optional newsletters you might subscribe to. Your user credentials are always safely encrypted.

Visualizations created with everviz log views through an Ajax call to our own servers. The information we gather through this view counter is limited to the referrer and user agent and is used for statistics (e.g. view counters, and an overview of referrers).

We use this information to be able to provide our service, for identification and authorization of users, and to be able to contact you. We will also need information in order to process the transaction and to comply with applicable tax/revenue laws.

## **What do we do with your information?**

We use third-party vendors called Recurly and Braintree, to store and process payments. These vendors adhere to the PCI Data Security Standard (PCI DSS) for Service Providers. Your IP address, email address, credit card details are passed on to Recurly and Braintree. We do not store or process your credit card information.

Wire transfers go through DNB Bank ASA.

Your name, email, company name, and License information is sent to HubSpot to follow up on your license and support term, including relevant product updates like or with other information that we think will be useful based on your previous interactions with us. However, you will not receive any newsletters or marketing communications without explicitly signing up for our newsletter.



When you make use of the optional everviz Google Sheets add-on, your information is stored in our database, hosted on Amazon web services and in Google Cloud Platform.

We do not use the information you provide to make any automated decisions that might affect you.

## **How long do we keep your information?**

We keep your information for as long as you have an active subscription with us. Once you unsubscribe from our service we will only retain information required by Norwegian tax and accounting laws (currently 10 years), and all other data will be promptly deleted.

Information about the transaction is kept for however long necessary to comply with applicable tax/revenue laws, which under current laws is 10 years.

## **Additional rights as a data subject**

In collecting this information, we are acting as a data controller and you have additional rights with regards to the data we store and process, which is outlined in the section below called '*Your rights as a data subject*'.

## **When you sign up to receive our newsletter**

This section outlines the information we collect from you when you sign up to receive our newsletter or sign up to receive notifications for product updates. Our legal basis for processing and collecting your personal data is based on consent in reference to Article 6-1(a) of the GDPR.

When you sign up to receive our newsletter or product release email, we will ask you for your first name and email address, and optionally other information about your interests, preferences, etc. We will collect your IP address and information about what kind of newsletter content that you engage with, e.g. which stories you want to learn more about by clicking on "read more" links next to story summaries.

Upon registration you will receive an email to confirm your registration. Unless you act upon that email, you will not be enrolled in our Newsletter list.

You may unsubscribe at any time by clicking the unsubscribe link at the bottom of any newsletter you receive.

## **Why do we collect this information?**

The email address will be used to periodically provide you with news and information about our products, services, and company, which we feel might be of interest to you. We ask for your first name because we are on a first-name basis with all our friends. Other optional information we ask for will be used to make sure we send you relevant information and to spot trends. We

collect your IP address to prevent fraud and identify geographical clusters of customers so we may serve you better.

We use web beacons to detect whether you have opened the newsletter we send or not. This is to keep track of your engagement and ensure we send you relevant information or if you have been inactive for more than the retention limit, we will ensure that your email will be deleted from our database.

Read more about web beacons [here](#).

We use UTM codes to identify specific sources of traffic and to customize content but never used for profiling or other, user identifiable, tracking.

Read more about UTM codes [here](#).

## **What do we do with your information?**

Your newsletter subscription is stored and processed in HubSpot.

We may ask for your consent to retain your information in our systems in order to send you further information that we think may be of interest to you.

## **How long do we keep your information?**

Your information is kept for as long as you continue to consent to receive our newsletter, but we cease to send you updates and will remove your data from our records if you are inactive for more than 2 years. Inactive, in this respect, means that you have not read any of the newsletters we have sent you. You may also opt-out such updates at any time, which will result in the prompt removal of you from our mailing list, along with any data regarding your newsletter usage.

## **Additional rights as a data subject**

In collecting this information, we are acting as a data controller and you have additional rights with regards to the data we store and process on you, which are outlined in the section below called '[Your rights as a data subject](#)'.

## **Your rights as a data subject**

By law, you can ask us what information we hold about you and ask to have it corrected if it is inaccurate.

If we have asked for your consent to process your personal data, you may withdraw that consent at any time, and you can request your data to be erased.

If we are processing your personal data for reasons to fulfill a contract, you can ask us to give you a copy of the information you have provided for us in a machine-readable format so that you can transfer it to another provider.

You have the right to ask us to stop using your information for a period of time if you believe our processing is not lawful.

We will not make automated decisions on the basis of the personal data we have collected.

You may not ask to delete, or substantially change financial transaction data since we are required to retain these data for 10 years for legal, tax or accounting purposes.

To submit a request regarding personal data by email, please use the contact information provided above in the '[Who we are](#)' section of this policy.

## **Your right to complain**

If you have a complaint about our use of your information, we would prefer that you contact us directly in the first instance so we can address your complaint.

To submit a request regarding personal data by email, please use the contact information provided above in the '[Who we are](#)' section of this policy.

## **Legal Requirements**

We might need to disclose personal data of users based on requirements by law. This might result in legal obligations or urgent needs to suspend or block an account. In such an event we will aim to notify the user that is affected by such actions.

We may also retain, preserve, or release person in response to lawful requests by public authorities, including to meet legitimate security or law enforcement requirements; to protect, establish, or exercise our legal rights or defend against legal claims, including to collect a debt; or investigate, prevent, or take action regarding illegal activities, suspected fraud, threats to our property, or violations of our [Terms and Conditions](#) for everviz or your custom Agreement.

## **Retention**

We will retain and use your information only as long as it is necessary for the purposes set out in this policy, and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements, and as otherwise described in this policy.

Specifically, We will retain your information for as long as you have an active service account with us, for as long as you remain subscribed to our newsletter, or as needed to provide the services to you. The exception is data from financial transactions, which we are required by local tax and accounting laws to store for 10 years.

## **Right to be forgotten**

If you have not interacted with our sales team, support team, subscribed to any of our newsletters or utilized any of our products and services, for 2 years, and your contact information is not necessary per the Retention policy above, we will automatically delete your records from our databases. The only exception is if you send us a job application. In this instance, we will keep your application for a maximum of three months.

## **Our Policy Toward Children**

Our services are not intended for users under the age of 13, and we do not knowingly collect or maintain information of such individuals. We encourage parents and guardians to monitor their children's online activities.

## **Updates to this privacy policy**

We regularly review and, if appropriate, update this privacy policy from time to time as our services and use of personal data evolves. If we want to make use of your personal data in a way that we haven't previously identified, we will contact you to provide information about this and, if necessary, to ask for your consent.

We will update the version number and date of this document each time it is changed.