

TRO KAPITAL AS

GDPR Privacy Policy of TRO KAPITAL AS

Effective Date: 26.09.2024

At TRO KAPITAL AS, we are committed to safeguarding your privacy and ensuring that your personal data is protected. This GDPR Privacy Policy explains how we collect, use, store, and protect personal data in compliance with the General Data Protection Regulation (EU) 2016/679 ("GDPR").

1. Data Controller

TRO KAPITAL AS

Org nr: 926 426 125

Adresse: Kvernhusrenen 7 A, 5208 Os

As the Data Controller, TRO KAPITAL AS is responsible for ensuring that your personal data is processed in accordance with the GDPR.

2. Types of Personal Data Collected

We may collect the following types of personal data from you:

- **Contact Information:** Name, email address, phone number, and mailing address.
- **Financial Information:** Bank account details, payment history, and transaction data (if applicable).
- **Usage Data:** Information about how you interact with our website or services (e.g., IP address, browser type, cookies, etc.).
- **Business Information:** Company details, business address, and VAT number (if applicable).

3. Purposes of Data Collection

TRO KAPITAL AS collects and processes personal data for the following purposes:

- **To Provide Services:** We use personal data to fulfill contractual obligations, deliver products and services, and process payments.
- **To Improve User Experience:** We may analyze usage data to enhance our website and service offerings.
- **To Communicate with You:** Personal data is used to send important updates, promotional offers (with consent), and customer service communications.
- **Legal Compliance:** We may process personal data to comply with legal obligations or regulatory requirements.

4. Legal Basis for Data Processing

Under the GDPR, we must have a lawful basis for processing your personal data. TRO KAPITAL AS processes data based on the following grounds:

- **Contractual Necessity:** When the processing is necessary to perform a contract with you or to take steps at your request before entering into a contract.
- **Consent:** When you provide explicit consent for specific processing activities (e.g., receiving marketing communications).
- **Legal Obligation:** When we must process personal data to comply with a legal obligation.
- **Legitimate Interests:** When processing is necessary for our legitimate business interests, such as improving services, provided your rights are not overridden.

5. Data Sharing and Disclosure

We do not sell or rent your personal data to third parties. However, we may share your data with trusted third parties in the following circumstances:

- **Service Providers:** We may share your data with third-party service providers (e.g., payment processors, hosting services) who help us operate our business and provide services to you.
- **Legal Requirements:** We may disclose personal data to comply with legal obligations or respond to lawful government requests.

6. International Data Transfers

If we transfer your personal data to countries outside the European Economic Area (EEA), we will ensure that appropriate safeguards are in place to protect your data in accordance with GDPR requirements.

7. Data Retention

We retain your personal data only for as long as necessary to fulfill the purposes for which it was collected or to comply with legal, accounting, or reporting requirements. When the data is no longer required, we will securely delete or anonymize it.

8. Your Rights Under GDPR

As a data subject, you have the following rights:

- **Right of Access:** You can request access to your personal data and obtain a copy of it.
- **Right to Rectification:** You can ask us to correct any inaccurate or incomplete personal data.
- **Right to Erasure (“Right to Be Forgotten”):** You can request the deletion of your personal data, subject to certain legal obligations.
- **Right to Restrict Processing:** You can request that we limit the processing of your personal data in certain circumstances.

- **Right to Data Portability:** You can request that we provide your personal data in a structured, commonly used, and machine-readable format.
- **Right to Object:** You can object to the processing of your personal data for direct marketing purposes or other legitimate interests.
- **Right to Withdraw Consent:** Where processing is based on consent, you can withdraw your consent at any time.

To exercise any of these rights, please contact us at [Insert Contact Email].

9. Data Security

TRO KAPITAL AS implements appropriate technical and organizational measures to protect personal data from unauthorized access, loss, misuse, or destruction. This includes encryption, access controls, and regular security audits.

10. Cookies and Tracking Technologies

Our website uses cookies and similar tracking technologies to enhance your browsing experience. For more information on how we use cookies, please refer to our [Cookie Policy].

11. Changes to This Policy

We may update this GDPR Privacy Policy from time to time to reflect changes in our practices or legal requirements. Any changes will be posted on our website, and we encourage you to review this policy periodically.

12. Contact Us

If you have any questions, concerns, or requests regarding this GDPR Privacy Policy or the processing of your personal data, please contact us at:

TRO KAPITAL AS

Org nr: 926 426 125

Adresse: Kvernhusrenen 7 A, 5208 Os

By ensuring GDPR compliance, TRO KAPITAL AS demonstrates its commitment to protecting your personal data and respecting your privacy.