

SVART

ON NATURE'S TERMS

Privacy Policy

Who is responsible for handling your personal information?

Greenside Invest AS is the owner of the project Svart and is responsible for handling and storing all your personal information according to the European GDPR (General Data Protection Regulation) that you supply when signing up to our newsletter. You can contact us with any questions at post@svart.no and we will get back to you as soon as possible.

You can read and find more information about the Norwegian rules for General Data Protection Regulation here (<https://www.datatilsynet.no/en/regulations-and-tools/regulations/>)

What right do we have to store and handle your information?

To be able to handle your personal information according to GDPR we need to have a right to process your data.

When you filled out the form to sign up for our newsletter you agreed for us to collect and store your data. We ask for your active consent by ticking out the boxes to make sure we have the right to handle your data – your consent is our legal right to do so according to GDPR article 6 no. 1 a) that consent is a valid reason to collect and store data.

How do you withdraw your consent?

At the bottom of our e-mail you have the opportunity to unsubscribe or manage your e-mail preferences, and when you do so – we automatically delete you and your data from our systems at HubSpot.

Do we use a CRM system to collect, store, and handle data?

Yes, we use HubSpot to store all our data and send out emails – and it is all stored in the EU.

We also use HubSpot for our statistics for performance which you can consent to in our cookie consent pop-up.

We use HubSpot to store your personal information such as your name, surname, phone number, and e-mail to send you automated newsletters about the project and cookies set by HubSpot for tracking statistics and performance of our website and blog. We reserve the right to delete non-active subscribers who have not opened e-mails in months.

- The SVART Team

SWART

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Does HubSpot use any subcontractors?

Yes, several:

Third-party sub-processor:

Amazon Web Services, Inc

Purpose:

Hosting & Infrastructure

Applicable services:

Used as an on-demand cloud computing platform and APIs

EU-Data center sub-contractor location: EU or other: Germany

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Third-party sub-processor:

Cloudflare, Inc.

Purpose:

Content Delivery Network

Applicable services:

Used as a web infrastructure and website security, providing content delivery network services, DDoS mitigation, internet security, and distributed domain name server services

EU-Data center sub-contractor location: EU or other: Local

**Data Centers located all around the world. Traffic will be automatically routed to the nearest data center.

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Third-party sub-processor:

Google, LLC

Purpose:

Infrastructure – Regional data processing

Applicable services:

Data warehouse solution which serves as the repository of data.

EU-Data center sub-contractor location: EU or other:

Germany

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Third-party sub-processor:

Snowflake, Inc.

Purpose:

Infrastructure

Applicable services:

Data warehouse solution which serves as the repository of data.

EU-Data center sub-contractor location: EU or other:

Germany

Third-party sub-processor:

Ably Realtime Ltd.

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Purpose:

Conversation & Chat Functionality

Applicable services:

Used to support conversations/chat features in the HubSpot product

EU-Data center sub-contractor location: EU or other:

Ireland and Germany

Third-party sub-processor:

ConvertAPI, UAB

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Purpose:

File Functionality

Applicable services:

Used for files and document conversion for websites and web/desktop applications

EU-Data center sub-contractor location: EU or other: Germany

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Which personal data for we collect and why?

First and foremost we collect the information we need for you to receive the newsletter, and that is:

Your name: We ask for your name because we love sharing our news with real people and like to address you as a person and not «dear sir/madam».

Your email: It is kind of obvious – but we need your email to send you emails.

We also handle information about how you open our emails and if you click links we send you. The most important reason we do this is because we want to make sure you actually want to be on our newsletter subscribers list. We send out newsletters every third week or so, but if we see that you have not opened or interacted with the last 3 emails or so – we will remove you from the list.

Another reason could be that you have changed e-mail addresses and that is why you have not opened the latest newsletters. If you do not use your e-mail anymore we need to know, and remove that e-mail address from the list – and this is how we find out.

How long will we store your information?

As long as you subscribe to our newsletter, or until you or we cancel it. If we cancel your subscription before you unsubscribe we will delete all your data.

Do we transfer your data to anyone?

Yes, to HubSpot – we pay them for their CRM and marketing services and store your information in their data center as described above. When you send in your information in a form on our website your data will be shared with HubSpot and their sub-contractors.

Do we transfer your data to other countries?

Yes, HubSpot shares your data with contractors in Germany and Ireland.

Do we process or automatically handle your data?

Yes, when you send in your data in a form we add you to a list based on what information you wish to receive (if you are interested in general information and newsletter, or contact us with questions, or if you are press.) and send out automated e-mails based on what we know. This is to ensure you only receive relevant information. Everything is stored and processed in HubSpot.

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How do you go about fulfilling your privacy rights?

You have several rights according to the privacy regulations. Here is how we interpret them for you:

1. You have the right to ask us for data portability

This is a right to prevent a commercial company from "capturing" your personal data. In short, it means that you should be able to take your personal data with you to a competitor. Because it is possible to subscribe to several newsletters at the same time, this is not a right that can be realized in this case.

2. You have the right to request that we delete your personal data

At the bottom of every newsletter, there is a link to click unsubscribe or manage your preferences – when you unsubscribe we automatically remove you from our lists and delete all your personal data from our systems.

3. You have the right to request that we correct your personal data

If you have misspelled your name or anything of the like, let us know and we will manually correct it for you. If you have typed your e-mail incorrectly we will not be able to deliver the email to your address, and you will be removed from the list when the newsletters are not opened.

4. You have the right to ask us for access to your personal data

Send us an e-mail, and we will give you insight into which specific personal data we process about you.

5. You have the right to request restriction of processing

If you think we are processing your data illegally you can request a restriction until we find out whether or not we are. It is uncertain how practical this right is – because we use consent as a legal basis for processing – the simplest solution would be for us to just delete you from our system.

6. You have the right to object to our processing of your personal data

If you disagree with how we use your personal data you can always object to the processing. Just send us an e-mail at post@svart.no and explain to us what you are dissatisfied with. A protest means that we can not use your personal information anymore, and you will be removed from our systems.

7. You have the right to information about how we process your personal data

This is the information in this privacy policy.

To request that I help you realize one of the rights on this list, send me us an e-mail at post@svart.no

(Remember to send us the e-mail from the e-mail address you subscribed from so that we are certain we are deleting the right data from our systems.)

Can you complain about this treatment?

Absolutely, if you like you can always complain about this processing to the Norwegian Data Protection Authority. They do have not a secure enough solution to send in complaints digitally yet, but you can send them by post to:

The Norwegian Data Protection Authority
PO Box 458 Centre
0105 Oslo